



MODERN SLAVERY STATEMENT



2022

1 CRITERION 1 – IDENTIFICATION OF ENTITIES COVERED BY THE STATEMENT

This is a Modern Slavery Statement (“**Statement**”) made on behalf of Agri Novatex Australia Pty Ltd. (ACN: 640 398 670) (the “**Reporting Entity**”) that is considered as a reporting entity pursuant to the Modern Slavery Act 2018 (Cth) (the “**Act**”).

2 CRITERION 2: STRUCTURE, OPERATIONS AND SUPPLY CHAINS

2.1. Structure

The Reporting Entity is a member of the Oceania region of the Tama Group that consist of two more companies as specified below. Using largely centralized functions, all three companies operate in an integrated manner, governed by their regional management. The regional management oversees the operations and risk in each of the companies.

All three companies are owned (directly or indirectly, as applicable) by an Israeli agricultural cooperative society named Tama R.M.W Agricultural Cooperative Society Ltd (“**RMW**”), which is owned almost entirely by Tama Group (99.6%). The headquarters of the Tama Group are located in Kibbutz Mishmar Ha’Emek, Israel.

Tama Group is an internationally renowned leader in the agri-business wrapping industry, developing, producing, and/or selling innovative products for wrapping mainly for pallets, bales of hay, straw, silage, seeds, and cotton.

The Reporting Entity is a limited liability company, incorporated under the Corporation Act 2001 (Cth) that was established on 20/4/2020. The offices of ANA are located at 3 Bristol St, Essendon Fields, VIC, 3041, Australia.

Tama Australia Pty Ltd (ACN: 617 155 361) is a limited liability company, incorporated under the Corporations Act 2001 (Cth) that was established on 13/2/2017. The offices of Tama Australia are located at: 3 Bristol St, Essendon Fields, VIC, 3041, Australia.

Plastag Pty Ltd (ACN: 132 505 161), is a limited liability company incorporated under the Corporations Act 2001 (Cth) that was established in June 2012. Plastag is domiciled and fully operates in Australia.

All three companies collectively employ 40 staff members across Australia.

2.2. Operations

The Reporting Entity import and sell international brands of crop baling solutions products within the agricultural and horticultural sectors. The main suppliers of the Reporting Entity are sourced from Tama Group and its subsidiaries. The Reporting Entity also purchase finished goods that are manufactured by third party international and well-known suppliers of crop baling products. The range of products constitutes (among others): wrapping pallets, netwrap, twine, silage films, wraps for cotton (Tama Wrap) and grain and forage bags.

The Reporting Entity’s key customers are rural merchandise businesses within Australia.

2.3. Supply Chain

The Reporting Entity supply chain is multi-tiered. The Reporting Entity’s tier 1 suppliers are those the Reporting Entity engages directly, while tier 2 and beyond suppliers are those who supply goods or services to the Reporting Entity’s tier 1 suppliers.

Tier 1

The Reporting Entity’s tier 1 suppliers are mostly:

- 1) suppliers of crop baling solutions products that are mainly companies within the Tama Group and third-party crop baling solution product suppliers
- 2) transportation service suppliers
- 3) storage service suppliers
- 4) professional services suppliers such as – accounting services suppliers, legal services suppliers, recruiting agencies, information technology suppliers, telecommunications, office services and equipment suppliers, marketing and advertising suppliers

The below is an overview of the Reporting Entity’s tier 1 supply chain, categorized by **expenditure**:

Category	Total Spend%	Sourcing Location	# Suppliers in Category
Crop baling solution products	86.50%	54% - Israel	47
		17% - Oceania	
		17% - Europe	
		8% - Asia	
		4% - Nth/Sth America	
Transportation service suppliers	2.80%	Australia	115
Storage service suppliers	2.60%	Australia	15
Professional services suppliers (e.g., accounting services, legal, recruiting agencies, information technology, telecommunications, office services and equipment, marketing and advertising, etc.)	8.10%	97% - Australia	151

Tier 2 - Suppliers

As Tama Group is the main supplier of the Reporting Entity, the Reporting Entity has a higher level of visibility over its tier 2 suppliers (as they belong to the Tama Group). Most of the Reporting Entity’s tier 2 suppliers operate in the crop packaging products industry and polyolefins (petrochemical industry) that are located and operate in north America and western Europe. For example, when Tama Group is the supplier of the Reporting Entity but purchases the goods from other members within its group and/or when Tama Group engages with raw material suppliers, then such engagement usually goes through a preliminary stage of evaluation and an annual supplier evaluation procedure.

These evaluation procedures do not currently include any reference to modern slavery; however, this matter will be addressed as part of supplier assessment questionnaires that will be introduced during FY 2023.

We accept that for certain suppliers, the Reporting Entity has less immediate visibility or control over the business practices and operations (tier 2 (that are not part of the Tama Group) and beyond), but the Reporting Entity understand that its procurement process at tier 1, may have the ability to influence outcomes at tier 2.

3 CRITERION 3 – IDENTIFICATION OF RISKS OF MODERN SLAVERY IN REPORTING ENTITY OPERATION AND SUPPLY CHAINS

Operation

The Reporting Entity considers that the risk of modern slavery in its operations is **low**.

The Reporting Entity employs directly on permanent or casual contracts. The Reporting Entity's labor workforce are predominantly administrative professionals located in Melbourne and sales staff located in each state within Australia.

The Reporting Entity considers such risk as **low** due to its recruitment and remuneration processes, which are coordinated by reputable third parties and assisted by its internal legal department and local lawyers who are all required to comply with local and international laws.

Supply chain

The Reporting Entity identified that the vast majority of its procurement includes finished goods sourced from manufacturing sites that are fully owned by Tama Group (subsidiaries/affiliates) and mostly do not include procurement from countries or industries that typically have a high risk of modern slavery (refer Global Slavery Index 2018).

However, the Reporting Entity identified the following categories of modern slavery risks for its business:

- ✓ **Domestic Suppliers/Service providers** – office maintenance or logistics services where the services procured involve work types such as – carriers, logistics services, warehousing and cleaning services. As the Reporting Entity engages with third party service providers there is a low risk that modern slavery conditions exist. However, as all are governed under Australian Law, Reporting Entity consider this risk to be low.
- ✓ **Offshore Suppliers** – the Reporting Entity has a small number of finished goods suppliers that are not members of the Tama Group (less than four percent from Reporting Entity's total purchases) who operate from countries such as China and India where the perceived risk of modern slavery may be elevated.
- ✓ **Tier 2 suppliers (and beyond)** - the Reporting Entity's supply chain has multiple tiers and therefore, there are certain industries, products or services which probably carry a higher risk of modern slavery than others. Although as mentioned above, the Reporting Entity has increased visibility of its tier 2 suppliers (especially of those within the Tama Group or sourced by Tama Group). There are some suppliers over whom the Reporting Entity has less visibility or control of business practices and operations. Some of these tiers 2 and beyond suppliers might be located in countries the Global Slavery Index identified as having a higher incidence of modern slavery practices or operate in the chemicals industry where there might be a potential risk deep in supply chain as part of the production of raw materials. However, Tama Group major suppliers are corporates with head offices in Europe/North America that have code of conduct that inter alia addresses modern slavery.

4 CRITERION 4 – REPORTING ENTITY ACTIONS TO ASSESS & ADDRESS MODERN SLAVERY RISKS

Policies

In order to create a working environment which is free from unlawful discrimination, harassment, sexual harassment, bullying, vilification and victimisation and implement awareness to ensure all workplace participants know their rights and responsibilities, the Reporting Entity obtains an Anti-Discrimination, Harassment & Bullying Policy.

In addition, as the Reporting Entity is a member of the Tama Group and is committed to follow Tama Group's values and act consistently with Tama Group values and policies. Tama Group also monitors the operation of its members, and such monitoring includes – periodic visits of group members and relocation of HQ member staff if required.

During the past few years, Tama Group commenced important organizational discussions and processes to emphasize the importance of securing human rights and the visibility of the individual.

These processes and discussions have been conducted at a wider organizational level and with the involvement of managers from different subsidiaries of Tama Group around the world to determine the Tama Group core values. For example, the value of equality was chosen to be among Tama Group's core values. Moreover, in global discussions about Tama Group's managerial foresight, significant attention was given to the visibility of the individual.

As part of the Tama Group effort to implement strong governance and control practice, Tama Group's management has approved in 2016 the Tama Group Anti-Bribery and Corruption, Anti-Trust and Competition Law policy.

In addition, during the past two years, Tama Group has taken several steps for preventing modern slavery at a group level.

As part of this process, in the beginning of Q2 of 2022, Tama Group's management approved the Tama Group's global Code of Conduct (the "**Code**"). The Code guides members of the Tama Group, including the Reporting Entity, on how it must conduct its business. In relation to modern slavery, the Code strictly prohibits any form of child labour and/or any form of abusive or illegal employment such as forced labour, slavery, involuntary labour, human or sex trafficking, and allows only voluntarily and freely chosen employment.

In addition to the above, any member of the Tama Group, including the Reporting Entity, must ensure its employees are employed fairly, and confirm their working conditions comply with the laws, standards and practices applicable in the countries where the members operate.

Supplier engagement and relationship:

The Reporting Entity require its suppliers and contractors to adhere to all domestic laws and regulations. These expectations are communicated through suppliers' agreements.

Moreover, and in addition to the Code, Tama Group has finalized a Suppliers' Code of Conduct (hereinafter the "**Suppliers' Code**"). This Suppliers' Code shall also be used as a channel to communicate the Reporting Entity expectations of their suppliers to:

- I. employ people that have reached the permissible age for working by local legislation; and
- II. not to employ, use, enable or wilfully ignore forced labour and make sure the employment is always voluntarily and freely chosen; and
- III. to ensure suppliers working conditions for employees working comply with the laws, standards, and practices applicable in the countries where the supplier operates.

Violation of the Suppliers' Code will jeopardize the supplier's business relationship with the Tama Group members including the Reporting Entity, up to including termination of these relationships.

The Suppliers' Code allows the Reporting Entity to monitor compliance with the Suppliers Code by its suppliers and accordingly, reserve the rights to request applicable documentation from suppliers and/or to implement an acceptable action plan to bring their performance into compliance.

The Suppliers' Code will be introduced in FY 2023.

In addition to the above, as part of the Code and Supplier's Code implementation process, Tama Group recently engaged Sedex (<https://www.sedex.com/>). Sedex provides business tools for supply chain mapping and risk assessment as well as monitoring, reporting supply chain performance and audit (if required).

The purpose of the engagement, among other things, is to give the Reporting Entity, as well as to other members of the Tama Group, a uniformed platform for managing suppliers on the ethical aspect, that will allow the Reporting Entity to examine their supplier's compliance with a number of core principles that are included in the Suppliers' Code and in global standards.

One of these principles is the validation that suppliers employ their employees according to the law and in a spirit that is compatible with the values detailed in the Suppliers' Code.

This examination will initially be made by sending questionnaires to core suppliers and analyzing the suppliers'

answers through the Sedex platform, to identify potential risks and to monitor the effectiveness of the Suppliers' Code on modern slavery risk management and compliance with human rights.

5 CRITERION 5 – ASSESSMENT OF EFFECTIVENESS OF TAMA'S CONTROLS

During FY 22, Tama Group as well as the Reporting Entity including of its procurement personnel, increased their level of awareness and understanding of modern slavery and required actions.

Given it is Tama Group's first year of reporting, the Reporting Entity has identified areas for continuous improvement during FY 23 and beyond and is committed to ensure more effective participation across their due diligence and training processes.

During FY 2023, the Reporting Entity focus will be to:

- Continue the development and implementation processes of the Code, governance control measures relating to modern slavery risk and increasing the awareness and understanding of Reporting Entity's employees and Suppliers in relation to modern slavery.
- Continue to develop and incorporate tools to raise awareness on an intra group level of modern slavery risks, including delivery of training to relevant staff and contractors.
- Initiate a cascaded process of introducing and/or implementing self-assessment questionnaires as a requirement for the Reporting Entity and/or Tama Group suppliers.
- Identify areas in Reporting Entity's supply chains that carry an elevated risk of modern slavery and implement measures to reduce that risk.
- Introduce a primary modern slavery contact person within Tama Group for Modern Slavery matters.

6 CRITERION 6 – PROCESS OF CONSULTATION

This Statement has been prepared by a team of representatives including legal and senior regional management who have Australian group-wide responsibility. This statement has also been approved by relevant senior managers within the Tama Group.

This statement is made on behalf of Agri Novatex Australia Pty Ltd (ACN: 640 398 670) for the financial year ending June 2022 and has been approved by the Board of the Agri Novatex Australia on 22nd December 2022.

Jason M. Amos, Director & Regional Manager

Agri Novatex Australia Pty Ltd.