



Modern Slavery Statement

Richland Express Pty Limited

16 September 2021

2021 Modern Slavery Statement

Richland Express Pty Limited (ACN 52 127 488 340) as the reporting entity fully support and are committed to ensure that there is no modern slavery in our supply chains or any other aspect of our business. We have a responsibility to contribute to the safeguard of human rights and will always actively support the need for both ethical and sustainable business practices.

Modern slavery and any form of slavery practice has no place in our supply chain. Our approach and efforts will focus on understanding the complexities of modern slavery and continually improving our processes to prevent it. We will continue to evolve our stakeholder relationships and commit to understanding ways in which we can work to help eliminate modern slavery from our supply chains.

Richland Express Pty Limited will continue to analyse and address the issue of modern slavery and recognise the critical need for all companies to work together to eradicate this risk in our global business world.

Richland Express Pty Limited is a reporting entity under the *Modern Slavery Act 2018* (Cth). This statement is in relation to the financial year ending 30 June 2022 and is made on behalf of Richland Express Pty Limited.

Corporate Structure

Richland Express Pty Limited is a private company and is recognised as the 4th largest business in the tobacco industry in Australia and turns over more than \$100m (AUD).

The average number of full time employees is 19.

Business operations for Richland Express Pty Limited Head Office are located in Blacktown, Sydney, Australia and distributes products under the trading name of Richland Brands. Our business model is the procurement, distribution and sale to various business houses who wholesale and retail our available product range within Australia.

Richland Express Pty Limited has the ownership or licence agreement to distribute the following brands:

Reef	Deal	Manitou	Bayside	Harvest	Tycoon
Muza	Jet	Fairgreen	Easy	York	Modern

Supply Chains

Richland Express Pty Limited's supply chain includes procurement of tobacco products, as finished goods in packets, cartons containing multiple packets and master cases that are ready for sale from various manufacturing partners. Materials sourced and utilised by the respective manufacturers and used in the production of all finished goods purchased by the business such as acetate filters, paper, tobacco blends, cardboard, polywrap, etc are sourced from a variety of related suppliers and the finished goods are then imported into Australia is from the following geographies:

- Germany 31%
- Luxembourg 65%
- Indonesia 4%

The above Nations are recognised in the Global Slavery Index 2018 as are the ratings that align with each country. The report identifies the top 15 list of products at risk of modern slavery by source country and tobacco does not feature. That aside we will work with all our supply chain partners as all corporates should in the pursuit of a much better situation for all humans attached.

The downstream sale of product is managed internally in the primary stage of the redistribution then through strategically important logistics providers handling the delivery of goods being Linfox and various other 3rd party logistics providers.

Richland Express Pty Limited's engagement with our major suppliers are all long term relationships and as part of our corporate integrity, we will continue to operate in a manner and take the necessary steps to ensure that modern slavery has no connection to any business that engages with our organisation.

Preventing Slavery and Human Trafficking

Richland Express Pty Limited will only operate with business partners that can satisfy our organisation that they do not support, encourage, or utilise modern slavery or human trafficking. We will communicate proactively regarding the need to have effective systems and controls that may prevent slavery and human trafficking in our supply chain.

The Global Slavery Index 2018, does not list tobacco as one of the top 15 high risk industries however this does not suggest that we as a business will not continue to ensure we consider the associated risks that could be attached to the supply chains attached to our manufacturing partners.

Richland Express Pty Limited will do all it can to negate the potential to **cause, contribute to or be directly linked** to modern slavery through its operations and supply chains.

Specific focus will be in what we see as the prevalent high-risk areas of:

- Working hours
- Health and safety requirements
- Child or forced labour
- Equality and respect in the workplace

Governance Initiatives Regarding Modern Slavery

Richland Express Pty Limited has an expectation that our supply chain partners fully commit to zero tolerance in respect to modern slavery.

Inhouse Training

The Supply Chain Manager for Richland Express Pty Limited will be responsible for compliance of our supplier relationships as well as the introduction of an in-house training for all attached staff. Clarity will be provided regarding the reporting of any modern slavery risks.

Modern Slavery Policy

Richland Express Pty Limited will develop and communicate our definitive expectations regarding modern slavery to all our supply chain stakeholders and outline our expectations in how we conduct our business future.

Supply Chain Contracts

Richland Express Pty Limited will include in the modern slavery clauses into all contracts with our supply chain business partners with the intent to link this directly to the modern slavery questionnaires.

Modern Slavery Questionnaire

Richland Express Pty Limited will develop and request completion of a relative annual questionnaire specific to modern day slavery withing their respective organisations and supply chains. Should any risk be identified, we will also request in writing what mitigating actions will be implemented to address such matters.

Employee Training

Richland Express Pty Limited will always expect our employees to be accountable under our overarching Code of Conduct Policy.

Training, appropriate information, and specific education sessions will be conducted internally on an annual basis, and we commit to reviewing and updating relevant materials, policies, and procedures. This will also form part of all induction programmes for new staff.

The principal that Richland Express Pty Limited will adhere to is that no human in our supply chain should be subject to any deprivation of their liberties and mistreatment will not be tolerated.

Should any Richland Express Pty Limited employee be identified as having any attachment to any and all applicable modern slavery or human trafficking law, they will be subject to appropriate disciplinary action.

We will annually assess the effectiveness of our actions regarding Governance Initiatives to Modern Slavery. This will involve regular review of policies as well as increased monitoring of any incidents of modern slavery risks in Richland's operations and supply chains where the practicalities of geography and access allow.

When producing this Modern Slavery Statement we formed a select, high level management group to ensure that the subject matter would be treated with the appropriate discussion and engagement. This will assure the focus and continuity of the intended staff education and specific engagement with the business shareholder group.

Richland Express Pty Limited is totally committed to take the required steps to inform, educate and implement initiatives that will assist in the appropriate stance against modern slavery and human trafficking.

This Statement was approved by the The Board of Richland Express Pty Limited in the capacity as principal governing body of Richland Express Pty Limited on 16 September 2021.

This Statement is signed by James Murray in his role as the Chief Executive Officer of Richland Express Pty Limited on 16 September 2021.



James Murray | Chief Executive Officer

Richland Express Pty Limited

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