

## Modern Slavery Statement

### Introduction

Tyremax is committed to ensuring transparency in our business and our approach to tackling modern slavery throughout our supply chains and operations.

This statement, which is intended to meet the requirements of the Modern Slavery Act 2018 (Cth) (**‘the Act’**), and submitted in accordance with section 14 of the Act, describes the steps taken by Tyremax Australia Pty Ltd ACN 143 706 610 and its associated entities, being:

- a) Tyremax Holding Pty Ltd ACN 646 270 797;
- b) Tyremax Pty Ltd ACN 111 414 218;
- c) T&R Imports Pty Ltd ACN 151 294 923;
- d) TMA Imports Pty Ltd ACN 646 270 706;
- e) TMA Imports Holdings Pty Ltd ACN 646 270 591;
- f) Tyres 360 Pty Ltd ACN 622 707 895; and
- g) Tasmanian Property Holding Pty Ltd ACN 608 648 965,

**(Tyremax, we, us, our)** during the financial year ending 30 June 2020 (**Reporting Period**) to seek to minimise the risk of modern slavery occurring in our business and supply chains.

### Business overview

#### Our structure and operations

Tyremax is a group of business operations, which are all controlled by same Management Board. We import, store and sells tyres to tyre retailers across Australia. Tyremax services both the on and off- highway segments of the tyre market. We are not involved with the manufacturing of the products we sell.

Tyremax has nine sale and distribution facilities based in all states and territories of Australia (with the exception of ACT) and services both metropolitan and regional areas across the breadth of Australia.

Our workforce consists of approximately 210 people of which approximately 160 are engaged directly and 50 are engaged indirectly. We do not employ anyone outside of Australia.

#### Our supply chains

As an importer and wholesaler, our supply chain involves the purchase of products from manufacturers based overseas and services needed to support the inbound freight, storage and delivery of products to our customers.

Products are sourced from numerous overseas manufacturers based in Europe, USA and Asia.

SYDNEY  
MELBOURNE  
BRISBANE  
PERTH  
ADELAIDE  
DARWIN  
LAUNCESTON  
WANGARATTA  
TOWNSVILLE

TYREMAX PTY LTD

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## **Modern slavery risk assessment and management**

We consider the risk of modern slavery within our direct business operations to be very low. However, we recognise that through our supply chain, we can be indirectly exposed to instances of modern slavery

We have over 1,000 Australian based trade and non-trade suppliers who provide ancillary goods and support services whilst all of our major product suppliers have manufacturing facilities located overseas. We have identified this international sourcing as a key risk area and will continue to review our vendor's policies and practices including the mechanisms they adopt to minimise the risk of modern slavery in their operations and upstream supply chains.

Tyremax has, for some time, conducted supplier risk assessments with emphasis on overseas suppliers. As a management team, we recognise this as a fundamental basis upon which we need to continuously review any instance where the possibility of modern slavery can occur and have improved our formal review processes during 2019/20.

During the Reporting Period, our primary focus has been on conducting an assessment of the operations of our overseas supply chains to identify key modern slavery risk hotspots together with a review of our internal employment policies and practices, which extends to the engagement of contractors and casual workers.

During our assessment, Tyremax considered risks that may potentially cause, contribute to or be directly participating in modern slavery practices, consistent with the Act and the Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities. These risks included: Financial; Geographic; Industry; and whether the supplier has submitted a modern slavery statement.

COVID-19 presented the business with some significant challenges during the Reporting Period and Tyremax was unable to perform a detailed due diligence phase. However, we have mapped out a plan based on the preliminary scoping exercise and have commenced a due diligence exercise via desk top reviews and critical questionnaires. Responses to these will help formulate more detailed actions, including site visits once international travel resumes so we can more independently review operations where heightened risks of modern slavery may be present.

Viewing our internal operations, we have employees on both permanent and casual contracts. Understanding that casual contracts can be considered a risk we are reviewing our employment policies so as to reduce this risk by reviewing our contracts. Due to the nature of our process, we do employ immigrants and people considered more vulnerable that are more likely to be less aware of their rights.

## The way forward

Going forward our approach to preventing and mitigating the risk of modern slavery in these areas will include:

- a. Undertaking further supplier due diligence and monitoring alignment of values with those at Tyremax;
- b. Continually monitoring employment practices including our contractors and any casual workforce
- c. Providing employee training; and
- d. Maintaining adequate reporting and monitoring mechanisms.

## Assessing our effectiveness in combating modern slavery

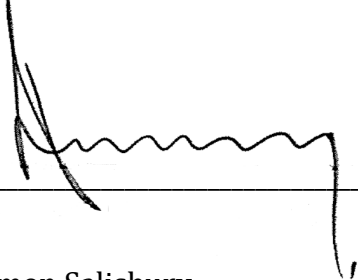
Tyremax will measure the effectiveness of our processes to ensure that modern slavery is not taking place in any part of our business or supply chains using various metrics, which have been summarised as follows:

Action	Metric	Detail
Overseas Supplier Reviews	Number of suppliers modern slavery warranties included in contracts.  Number of suppliers which have completed due diligence questionnaires.	Vendor Agreements to be updated to include Modern slavery warranties on renewal.  All Tier 1 Overseas Suppliers responded to questionnaires
Employment Practices	All employment policies formally reviewed annually and pay rates reviewed against relevant awards.	All relevant policies reviewed and re-issued.  All pay rates have been reviewed against relevant award.
Training	Number of people within our business who received modern slavery training during the Reporting Period.  Total number of training hours delivered in relation to modern slavery.	Initial training on Modern Slavery has been delivered to those involved with procurement and engaging personnel.
Reporting and Monitoring	Number of people who reported issues concerning modern slavery  Number of reported issues escalated to the Board of Directors.	There have been no reports concerning allegations of modern slavery within our operations or supply chains during the Reporting Period.

## Oversight and governance

The Tyremax Board of Directors are common Directors in all the Tyremax companies within the scope of this statement and control the Executive Management Team who in turn are accountable for managing the business' operations including human rights. At this point there is no Human Rights Steering Committee in place at Tyremax, rather it is a responsibility of our Executive Management Team, most particularly the Chief Operations Officer, Group Procurement Officer and National Operations Manager assisted by our Human Resources team to ensure that we meet the requirements of the Modern Slavery Act.

This statement was approved by the Board of Directors of Tyremax Australia Pty Ltd ACN 143 706 610 on 31 March 2021.



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Simon Salisbury  
Director

31 March 2021