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## **Modern Slavery policy**

**National Tyre & Wheel Limited**  
**ACN 095 843 020**

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## 1. Introduction

- 1.1 National Tyre & Wheel Limited ACN 095 843 020 (**Company or National Tyre & Wheel**) has adopted this modern slavery policy (**Policy**) to outline our commitment and approach to ensuring the Company has robust frameworks and processes in place to identify and mitigate risks of modern slavery taking place in its supply chain. **“Modern slavery”** includes situations where workers are coerced, deprived of freedom, or forced to work in order to pay off debts.
- 1.2 This Policy should be read in conjunction with the Company’s Code of Conduct.
- 1.3 A copy of this Policy is accessible to all officers and employees of the Company via the Company's website.

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## 2. Entities covered by the Policy

- 2.1 In addition to National Tyre & Wheel Limited, the following related entities are also covered by this policy:
- (a) Exclusive Tyre Distributors Pty Ltd ACN 159 029 357;
  - (b) Dynamic Wheel Co. Pty Limited ACN 007 147 364;
  - (c) M.P.C Mags and Tyres Pty Ltd ACN 117 639 040;
  - (d) Statewide Tyre Distribution Pty Ltd ACN 008 181 904;
  - (e) Tyres4U Pty Ltd ACN 642 540 690;
  - (f) Tyreright Operations Pty Ltd ACN 646 640 897;
  - (g) Exclusive Tyre Distributors (NZ) Limited NZBN 94 290 310 880 60;
  - (h) Tyres4U (NZ) Limited NZBN 94 290 484 950 59; and
  - (i) Top Draw Tyres (Pty) Ltd Company Number 2011/138904/07
- (together with National Tyre & Wheel, the **Group**).

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## 3. Operations and supply chain

- 3.1 National Tyre & Wheel is a tyre and wheel wholesaler and distributor carrying on business through subsidiary operating entities in Australia, New Zealand and South Africa. The corporate head office is in Brisbane, Australia. The Group operates distribution centres, comprised of third party logistic providers and our own premises, throughout Australia, New Zealand and South Africa as well as the Tyreright retail network which is comprised of National Tyre & Wheel owned, licensed and affiliated stores. The Group employs over 600 people and imports more than two million units each year.
- 3.2 The Company imports and distributes tyres, tubes and wheels for the car, SUV, 4WD, caravan, light commercial, truck & bus, industrial, agricultural and off the road segments.
- 3.3 The Company is the exclusive importer and distributor of over 35 tyre brands to their geographical market (i.e. Australia, New Zealand and/or South Africa).



- 3.4 The Company also provides value added services to customers including technical and sales training, co-op advertising, delivery services, data analytical tools, design services, merchandising support and fitment advice.
- 3.5 The Company sources tyres and wheels from suppliers located in a number of countries including, but not limited to:
- |                |             |                          |
|----------------|-------------|--------------------------|
| Australia      | Israel      | Spain                    |
| China          | Malaysia    | Sri Lanka                |
| Czech Republic | Mexico      | Taiwan                   |
| Germany        | New Zealand | Thailand                 |
| India          | Serbia      | United States of America |
| Indonesia      | South Korea | Vietnam                  |
- 3.6 The raw materials used in products acquired are sourced from the countries included above.
- 3.7 The Company has standard industry terms and arrangements with suppliers with payment terms ranging from bill of lading to 120 days.

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#### **4. Commitment**

- 4.1 National Tyre & Wheel is committed to working with its supply chain partners to ensure our business operates lawfully and ethically. We expect our suppliers and business partners to commit to ethical standards of conduct in daily business, including by ensuring that workers are fairly paid, treated with dignity and provided with a safe working environment.

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#### **5. Policies and procedures**

- 5.1 National Tyre & Wheel has a number of global policies already in place that are intended to promote ethical and legally compliant business conduct as well as mitigate modern slavery risks in our supply chain. These policies demonstrate our organisation's commitment to preventing violations of human rights such as modern forms of slavery in our business and in our supply chain.

##### **5.2 Modern Slavery Policy**

The Company maintains this policy, which outlines our approach to identifying and responding to risks of modern slavery practices within our supply chains and operations.

All National Tyre & Wheel personnel, suppliers and business partners must read, understand and comply with this Policy.

##### **5.3 Code of Conduct**

We have a global Code of Conduct (available at <https://www.ntaw.com.au/investors/corporate-governance/>) which sets out the Company's commitment to, among other things:

- (a) ensure a safe workplace where risks are identified and eliminated or mitigated in consultation with each other;
- (b) comply with the laws and regulations that apply to the Company's operations; and
- (c) not knowingly participate in any illegal or unethical activity.



#### 5.4 Risk Management Policy

The Company's Risk Management Policy (available at <https://www.ntaw.com.au/investors/corporate-governance/>) sets out our policy in relation to the identification, assessment, management and reporting of risk. It provides that *"All staff have a responsibility to identify, assess, manage and report risks to management within their areas of operation."*

Some of the particular potential risks that are noted in the policy include *"changes in legislation or the regulatory environment", "changes in government regulation and policy" and "changes in workplace health and safety laws."*

#### 5.5 Whistleblower Policy

The Company encourages the reporting of suspected unethical, illegal, fraudulent, corrupt or dishonest conduct and shall ensure that those who report may do so with confidence and without fear of intimidation, ramifications or adverse consequences.

Our Whistleblower Policy (available at <https://www.ntaw.com.au/investors/corporate-governance/>) is designed to ensure the protection of those "speaking up" about misconduct (also known as "whistleblowers") and sets out how the Company will respond to reports of misconduct.

The Whistleblower Policy defines "Reportable Conduct" and provides that it may include *"dishonest, corrupt, fraudulent or unlawful conduct or practices", "unethical or serious improper conduct including breaches of any legal or regulatory obligations" and "any other conduct or act that may cause loss to the Company or which may otherwise be detrimental to the Company's interests including unsafe work practices or abuse of the Company's property or resources."*

The policy sets out details of who Reportable Conduct should be reported to, how to make a report and how reports will be investigated. It also provides for a number of protections for whistleblowers, including confidentiality protections.

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## 6. Modern Slavery Act 2018 (Cth)

6.1 National Tyre & Wheel is subject to the *Modern Slavery Act 2018* (Cth) (**the Act**) that commenced on 1 January 2019. The Act requires National Tyre & Wheel to publish an annual modern slavery statement outlining the risks in our supply chain and the steps we are taking to respond to the risks identified.

6.2 The Company is committed to:

- (a) providing relevant compliance training when inducting and onboarding new personnel and ensuring all personnel are kept aware of all aspects related to modern slavery risks;
- (b) regularly assessing the potential modern slavery risks in our operations<sup>1</sup> and supply chains<sup>2</sup>;
- (c) maintaining awareness of the social and environmental practices of our suppliers<sup>3</sup>, and working with them to improve those practices where required; and
- (d) periodically reviewing and (if appropriate) updating our policies and processes for mitigating modern slavery risks in operations and supply chains.

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<sup>1</sup> 'Operations' is defined as activity controlled by National Tyre & Wheel and its divisions/business units.

<sup>2</sup> 'Supply chains' is defined as suppliers and service providers to National Tyre & Wheel and its divisions/business units.

<sup>3</sup> 'Suppliers' is defined as factories, supplier sites and providers of goods or services to National Tyre & Wheel and its divisions/business units



- 6.3 The types of practices which our suppliers are contracted to undertake include the manufacture, sale and export of tyres for import and distribution by entities in the National Tyre & Wheel Group.
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## **7. Communications and training**

- 7.1 National Tyre & Wheel is in the process of preparing compliance training that can be regularly provided to personnel. In particular, Company personnel who have responsibility over supply chain management will be provided with training in relation to modern slavery risks and our approach to identifying and limiting those risks within our supply chains and operations. This training is expected to be rolled out during 2021.
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## **8. Reporting and responding to concerns of modern slavery**

- 8.1 An important part of maintaining our ethical standards is encouraging National Tyre & Wheel personnel, suppliers and business partners to feel comfortable to report instances where the Company or its personnel are not acting ethically or in accordance with this Policy.
- 8.2 Our personnel should notify their manager, or email the Group People & Culture Officer (at [JackieB@ntaw.com.au](mailto:JackieB@ntaw.com.au)) if they believe or suspect a breach of this Policy has occurred. Our Whistleblower Policy, which can be found at <https://www.ntaw.com.au/investors/corporate-governance/>, provides more information on how personnel can report concerns about illegal or unethical conduct.
- 8.3 We may terminate our employees' employment if they breach our Code of Conduct.
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## **9. Approval and review of Policy**

- 9.1 This Policy was approved by the Board on 27 January 2021.
- 9.2 The Board will review this Policy periodically to ensure that it is operating effectively. This Policy may be amended by resolution of the Board.
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## **10. Questions**

- 10.1 For questions about the operation of this Policy or its application in any particular situation, please contact the Group People & Culture Officer.