

GOV_POL010_ MODERN SLAVERY POLICY

1. PURPOSE

Tasmanian Independent Retailers Co-Operative Society Ltd is committed to limiting the risk of modern slavery occurring within our own business, through our supply chain relationships or through any other business relationship.

The aim of the Modern Slavery Policy is to ensure our suppliers, supply chain partners and TIR staff are all aware of the impact modern slavery and make all reasonable attempts to ensure all procurement channels have actions in place to minimise the likelihood of modern slavery instances and encourage reporting and corrective actions should any breaches be identified.

2. SCOPE

This policy and its associated procedures apply to all employees, suppliers, and business partners engaged with Tasmanian Independent Retailers Co-Operative Society Ltd

3. ROLES AND RESPONSIBILITIES

Employees are responsible for:

- Understanding and complying with this policy
- Promptly reporting to their manager if they suspect there has a breach of this policy
- Participating in any training or awareness activities relating to modern slavery as requested

Managers are responsible for:

- Ensuring employees have received and understood training in relation to Modern Slavery and its impacts
- Monitoring compliance with this policy by members of their team
- Communication the Tasmanian Independent Retailers Co-Operative Society Ltd expectations to suppliers
- Notifying the CEO or approved delegate if there is an emerging concern about compliance with this policy
- Ensuring that each member of their team understands the principles outlined in this policy
- Ensuring there is a 'whistle-blower/grievance' mechanism to enable reporting of any concerns without fear of retaliation

Suppliers and Business Partners

- Understand Tasmanian Independent Retailers Co-Operative Society Ltd expectations, report breaches and ensure open and honest communication

4. POLICY

- Tasmanian Independent Retailers Co-Operative Society Ltd expect our staff, suppliers, and business partners to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery-like practices, human trafficking, and child labour
- Observe all laws regarding corporate social responsibility, environmental and workplace safety protection and staff inclusion and diversity
- Integrate human rights considerations, including modern slavery, into our risk management processes

5. ACTIONS

We aim to implement the following:

- Developing a risk-based approach focusing our efforts on select parts of our business and select suppliers
- Engaging with our suppliers to convey to them our Modern Slavery Policy and our expectations in reporting any modern slavery breaches
- Undertaking supplier pre-screening as part of our tender processes

LOCATION GOV	REVISION NO. 3	DATE OF ISSUE Board Approved 02 Oct-25	DOCUMENT NO. GOV_POL010_Modern Slavery Policy	PAGE NO. 1 of 2
-----------------	-------------------	---	--	--------------------

- Including contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to request information regarding their approach to addressing modern slavery in their supply chain processes.
- Developing a process to assess improvements in combatting modern slavery in our supply chain.

6. MODERN SLAVERY STATEMENT

Tasmanian Independent Retailers Co-Operative Society Ltd is subject to the reporting requirements of the *Modern Slavery Act 2018* requiring the submission of an annual Modern Slavery Statement to identify and address the following mandatory criteria:

- The reporting entity's structure, operations, and supply chains
- Modern slavery risks in the reporting entity's operations and supply chains (including those of subsidiary entities)
- Actions taken (including by subsidiary entities) to assess and address those modern slavery risks, including due diligence and remediation processes
- How the reporting entity assesses the effectiveness of actions taken
- The process of consultation with subsidiary entities in preparing the modern slavery statement

7. COMMUNICATION & REPORTING

- Provide adequate training to employees to ensure a high level of understanding of the nature of modern slavery and the influence the company can bring to ensure that it does not occur within any part of its own business and in any of its supply chains.
- Ensure Suppliers and Business Partners receive communication on the TIR Groups expectations on Modern Slavery compliance
- Report the following at each Board Meeting:
 - any breaches of this policy
- Report the following at each RAAC Meeting:
 - any breaches of this policy
 - modern slavery risk and an update on what actions are being undertaken to address these risks.

8. BREACH OF POLICY

- The breach of this policy by an employee, director or officer of the company may lead to disciplinary action being taken in accordance with the company's disciplinary procedure.
- All employees, directors and officers of the company will be expected to cooperate fully in any investigation into suspected breaches of this policy or any related processes or procedures.
- If an issue is identified with a supplier, we will work with them to prepare a corrective action plan and resolve all violations within an agreed upon time period. If the issue cannot be resolved in a timely manner, we reserve the right to terminate our relationship with the supplier or business partner in our supply chain.

LOCATION GOV	REVISION NO. 3	DATE OF ISSUE Board Approved 02 Oct-25	DOCUMENT NO. GOV_POL010_Modern Slavery Policy	PAGE NO. 2 of 2
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