



# MODERN SLAVERY

Modern Slavery Policy  
September 2020



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Tyrecycle Pty Ltd values all workers that contribute to the success of the business. Henceforth, the term “workers” will be used to define any employee, contractor or labour hire person who is ‘working’ for Tyrecycle in some capacity.

## **Purpose and position**

The purpose of this policy is to ensure that Tyrecycle adequately assesses and addresses any potential modern slavery risks in its supply chains.

Tyrecycle has a clear expectation that all of its suppliers and contractors operate in accordance with modern slavery laws and are socially responsible. Tyrecycle will take all practicable measures to ensure that its suppliers and contractors meet this expectation and will not engage with any suppliers and contractors that have known or suspected links to modern slavery.

## **Scope**

This procedure applies to all employees, suppliers and contractors to Tyrecycle regardless of whether the employing or contracting entity is a reporting entity for the purposes of the Modern Slavery Act 2018 (Cth).

## **Modern Slavery**

### **Background**

Tyrecycle operations include the transport, receipt, treatment and disposal of waste materials, as well as the re-manufacturing of certain waste materials into products and alternate fuels.

Tyrecycle has a supply chain which includes the acquisition and operation of plant and equipment required for day-to-day operations, contracting of transport services, leasing of office space interstate and overseas, employment of staff, and provision of various support services (including IT services, advertising, advisory services, and insurance).

Tyrecycle is subject to the Modern Slavery Act 2018 (Cth) which requires a reporting entity to produce an annual Modern Slavery Statement assessing the risks of modern slavery in the entity's supply chain for the previous financial year.

There is no universal definition of Modern Slavery. The term is used to cover a range of exploitative practices including human trafficking, slavery, forced labour, child labour, removal of organs and slavery-like practices. This can occur to both males and females and to both adults and children.

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## **Employees**

Tyrecycle does not tolerate any threat, or the imposition of any physical or sexual violence, harassment or intimidation against workers or their family or close associates.

All workers will be treated fairly and equally and will be paid not less than the national minimum wage. No employee will be forced to work in excess of the hours permitted by law.

## **Modern Slavery Incident**

Each worker, supplier and contractor are strongly encouraged to notify management of any suspected instances of unsafe working practices and/or if they have any concern about modern slavery within the Tyrecycle supply chain. Management should then report the concern to the Tyrecycle General Counsel.

Workers, suppliers, contractors or other members of the public who are concerned and who do not feel comfortable notifying management can confidentially contact Tyrecycle's General Counsel direct who will respond to any issues raised, including to any known or suspected instances of modern slavery that are identified.

## **Responsibility**

### **General Counsel**

The General Counsel is responsible for ensuring that the Tyrecycle Modern Slavery Statement is issued within the time frames required in the Modern Slavery Act 2018 (Cth).

### **Suppliers and contractors**

All of the Tyrecycle suppliers and contractors are required to comply with their obligations under the Modern Slavery Act 2018 (Cth) and to operate in a socially responsible way.

### **All Employees**

Workers are required to report any concerns related to modern slavery to the General Counsel. The General Counsel is required to investigate and address any concerns raised in relation to modern slavery.

Workers working with suppliers and contractors will be given annual training on modern slavery to build awareness and facilitate compliance with modern slavery laws and this policy.

New Supplier or Contractor Questionnaire

As part of ensuring that Tyrecycle is not engaging with suppliers and contractors who have links to modern slavery, Tyrecycle requires that all new contractors and suppliers answer a Modern Slavery Questionnaire before they can be entered into our Accounts System. Tyrecycle's Accounts Team must ensure that the questionnaire has been issued to all new suppliers and contractors, and that a response has been received, at or prior to the entry of the supplier into our Accounts System.

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Existing key suppliers and contractors may be required to complete the questionnaire prior to the first annual Modern Slavery Statement due date and subsequently on an annual basis. If it is found that any existing suppliers or contractors fail to have appropriate measures in place to protect against modern slavery, or have known or suspected links to modern slavery, Tyrecycle will take action to no longer engage those suppliers and contractors going forward.

## **Documentation**

Modern Slavery Questionnaire (Form 52)

## **Further information**

Any worker requiring further information about this policy should contact any member of the Management Team.



***Simon Brown***  
***Managing Director***

