

MODERN SLAVERY STATEMENT OF COMMITMENT

TYRE STEWARDSHIP AUSTRALIA

SEPTEMBER 2021



TSA Modern Slavery Statement of Commitment

Tyre Stewardship Australia (TSA) is committed to respecting human rights including freedom from modern slavery. This statement identifies our areas of modern slavery risk and our commitments to address these and drive impact across our sector. It builds on our [Modern Slavery Impact Statement](#) which sets out additional context around modern slavery risks for the tyre sector and key actions we are taking to address modern slavery.

While TSA is not a reporting entity under the *Modern Slavery Act 2018* (Cth) (MSA), we have prepared this statement of commitment to demonstrate support for the MSA. While this is not a modern slavery statement under the MSA, it draws on the MSA's mandatory criteria as a useful framework for organisations to explain their approach to preventing and addressing modern slavery in their operations and supply chain.

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This document can also be accessed on our website: [Click here](#)



TSA's purpose is to drive sustainable outcomes for end-of-life tyres (EOLT).

Our vision is a circular economy for EOLT which contributes to a sustainable society.

Our mission is to collaboratively ensure the sustainable management, recycling and productive use of EOLT.

About TSA

1

TSA was established to implement the national Tyre Product Stewardship Scheme (Scheme) which aims to promote the development of viable markets for end-of-life tyres (EOLT).

TSA accredits participants, including tyre retailers, collectors and recyclers, who are committed to supporting the objectives of the Scheme. TSA also invests in market development initiatives including research and development, and commercialisation, of new productive uses for EOLT.

TSA recognises the importance of addressing the social impacts, positive and negative, of EOLT. This includes ensuring that human rights – including freedom from modern slavery – are respected in the transportation, processing and use of EOLT.

We have undertaken a high-level assessment of our modern slavery risks. In describing these risks and our potential for involvement in them, we have used the concepts of cause, contribute and directly linked as set out in the [UN Guiding Principles on Business and Human Rights](#).

Our operations and activities

2

TSA is a small non-profit company with less than 10 staff who work from our office in Melbourne. We also hire contractors to perform professional services in our offices from time to time.

We acknowledge that we could cause modern slavery if we employed exploited labour. We employ only professional staff, have a number of policies and processes in place to ensure we meet or exceed all applicable employment laws, and consider this risk to be very low. We also have a [Whistleblower Policy](#) that is applicable to our employees.

There are also risks of contributing or being directly linked to modern slavery through our activities, including as follows.

Market Development

TSA provides funding to projects focused on developing and demonstrating new and enhanced uses of tyre derived products. Our partners in these projects include companies and universities. While we conduct due diligence on these partners, there is a risk that a partner or project may use exploited labour (although we consider this risk to be low) or otherwise be connected with modern slavery (e.g. in its supply chain). We are considering ways to strengthen our due diligence processes for our market development partners including in relation to labour rights risks, including modern slavery.

Foreign End Markets Verification Program (FEM Program)

TSA's FEM Program verifies foreign end destinations that EOLT and EOLT products are sent to, in accordance with key environmental, health and safety, and modern slavery and other labour standard requirements. TSA has engaged an independent third party to undertake the verification activities. However, we acknowledge that there is a risk that instances of modern slavery may not be identified through verification and audit processes. In addition, the program does not audit brokers or shipping providers that are involved in moving materials from Australia to foreign destinations and these activities (particularly international shipping) carry risks of modern slavery. As the FEM Program continues to expand, we will consider appropriate steps to assess the effectiveness of the verification process.

More generally, there are risks of modern slavery and other human rights issues along the EOLT value chain, including in rubber production, tyre manufacturing and distribution, collection and processing of EOLT, as elaborated in our Modern Slavery Impact Statement. While TSA would not be "involved" in any of these impacts we are committed to raising participant and member awareness and capacity in relation to modern slavery risks.

In relation to collectors and recyclers, which are known to use casual labour on short-term arrangements, we have also introduced a requirement for them to complete an Employee Entitlements Declaration (EED). The EED provides information on their workforce including payments made to workers and the use of labour hire agencies (recognising that this is a known area of labour exploitation risk for low paying roles), and make a declaration as to compliance with key workplace laws and standards. This was first implemented in Dec 2020 and although responses were received, TSA acknowledges there is work to do to fill some data gaps. Verification of the declaration is to be included as part of updated audit protocol for collectors and recyclers.

Supply chain

3

Due to our size and the nature of our activities, we purchase goods and services from a limited number of suppliers. A review of our purchasing activities identified the following categories of goods and services as higher risk for modern slavery:

- Technology hardware (e.g. laptops, phones)
- IT services
- Office services (cleaning, security, waste)
- Travel and transportation
- Office supplies (stationery, furniture, fitout)
- Promotional materials

We will take steps to understand these risks further, and take appropriate steps to address them, although as a small organisation our leverage with the majority of these suppliers is low.

Commitments

4

We are committed to taking steps to address TSA's own modern slavery risks, and drive impact on this issue more broadly through the tyre sector. Our next steps include:

- Capacity building for Scheme participants in relation to modern slavery which will support implementation of the EED requirement and continuous improvement in Scheme participants' approaches to managing their labour related risks;
- Introducing due diligence, including around modern slavery, in relation to our applicants for accreditation and market development partners;
- Consider due diligence requirements or set of supplier expectations for use with appropriate suppliers (based on risk);
- Introducing assurance of EEDs such as via verification as part of audit process; and
- Exploring the establishment of a working group for the Scheme's levy paying Contributors to support ongoing implementation and continuous improvement in relation to human rights risk management including modern slavery.

Additional Information

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If you have any queries regarding TSA's Modern Slavery Statement of Commitment, please contact TSA:

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