
Modern Slavery policy

NTAW Holdings Limited
ACN 095 843 020

1. Introduction

- 1.1 NTAW Holdings Limited ACN 095 843 020 (**Company or NTAW**) 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.

2. Entities covered by the Policy

- 2.1 In addition to NTAW Holdings Limited, the following related entities are also covered by this policy:
- (a) National Tyre & Wheel Pty Ltd ACN 159 029 357;
 - (b) Dynamic Wheel Co. Pty Limited ACN 007 147 364;
 - (c) Statewide Tyre Distribution Pty Ltd ACN 008 181 904;
 - (d) Tyreright Operations Pty Ltd ACN 646 640 897;
 - (e) Solid Plus Operations Pty Ltd ACN 654 841 380;
 - (f) Black Rubber Pty Ltd ACN 162 283 427;
 - (g) Black Rubber Retreading Pty Ltd ACN 616 484 596;
 - (h) NTAW Logistics Pty Ltd ACN 652 502 415;
 - (i) ACN 642 540 690 Pty Ltd (formerly Tyres4U Pty Ltd) ACN 642 540 690;
 - (j) ACN 117 639 040 Pty Ltd (formerly M.P.C Mags and Tyres Pty Ltd) ACN 117 639 040;
 - (k) NTAW Holdings (NZ) Limited NZBN 94 290 491 115 14;
 - (l) Exclusive Tyre Distributors (NZ) Limited NZBN 94 290 310 880 60;
 - (m) Tyres4U (NZ) Limited NZBN 94 290 484 950 59;
 - (n) Carters Tyre Service Limited NZBN 94 290 367 345 80;
 - (o) C.O. Tire & Retreading Co Limited NZBN 94 290 380 934 94;
 - (p) Tyre Distributors New Zealand Limited NZBN 94 290 469 841 59; and
 - (q) Dynamic Wheel Co. (NZ) Limited NZBN 94 290 529 915 23,
- (together with NTAW, the **Group**).

3. Operations and supply chain

- 3.1 NTAW is a tyre and wheel wholesaler and distributor carrying on business through subsidiary operating entities in Australia and New Zealand. 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 Black Rubber & Tyre right retail networks in Australia and the Carter's retail network in New Zealand, which is comprised of NTAW owned, licensed and affiliated stores. The Group employs over 750 people.
- 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 25 tyre brands to their geographical market.
- 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, wheels, tubes and related products primarily from suppliers located in China and United States of America (approximately 90% of all stock purchases). Other countries where NTAW sources products from include, but are not limited to:
- | | | | |
|-----------|-----------------|-------------|----------|
| Australia | Japan | Russia | Thailand |
| Finland | Malaysia | Singapore | Vietnam |
| Germany | The Netherlands | South Korea | |
| India | New Zealand | Sri Lanka | |
| Indonesia | Romania | Taiwan | |
- 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.

4. Commitment

- 4.1 NTAW 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.

5. Policies and procedures

- 5.1 NTAW 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 NTAW 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 the NTAW website) 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 the NTAW website) 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 the NTAW website) 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.

6. Modern Slavery Act 2018 (Cth)

- 6.1 NTAW is subject to the *Modern Slavery Act 2018* (Cth) (**the Act**) that commenced on 1 January 2019. The Act requires NTAW 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 operations¹ and supply chains²;
 - (c) maintaining awareness of the social and environmental practices of our suppliers³, 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.
- 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 NTAW Group.

7. Communications and training

- 7.1 NTAW is committed to providing personnel with training in relation to modern slavery risks and an understanding of the Company's approach to identifying and mitigating modern slavery risks within our operations and supply chains. Training modules regarding modern slavery awareness, harassment and discrimination prevention and understanding NTAW's code of conduct (amongst other applicable modules) are delivered through the Company's online training platform. Completion of specific modules are undertaken annually, aligned with each employee's position and function. These modules are included in the induction process for all new employees.

8. Reporting and responding to concerns of modern slavery

- 8.1 An important part of maintaining our ethical standards is encouraging NTAW 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 direct manager or the HR Manager (at PetaW@ntaw.com.au) if they believe or suspect a breach of this Policy has occurred. Our Whistleblower Policy 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.

¹ 'Operations' is defined as activity controlled by NTAW and its divisions/business units.

² 'Supply chains' is defined as suppliers and service providers to NTAW and its divisions/business units.

³ 'Suppliers' is defined as factories, supplier sites and providers of goods or services to NTAW and its divisions/business units.

9. Approval and review of Policy

- 9.1 This Policy was approved by the Board on 28 November 2025.
- 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.

10. Questions

- 10.1 For questions about the operation of this Policy or its application in any particular situation, please contact the HR Manager.