



**Commonwealth Modern Slavery Act 2018**  
**Annual Report**  
**Year Ending 31 December 2023**

**PERTH**

11 Vincent Street  
Bayswater WA 6053  
p 9284 1399

**SOUTHWEST**

20 Possum Place  
Vasse WA 6280  
p 9754 2643

Prepared by:

**Tranen Pty Ltd**  
 ABN 37 054 506 446  
**11 Vincent St**  
**Bayswater WA 6053**  
 p: (08) 9284 1399  
 email@tranen.com.au  
 www.tranen.com.au

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## 1 INTRODUCTION

In 2019 Tranen, in response to advice by some clients of their need to comply with the provisions of the Commonwealth Modern Slavery Act 2018, developed the following policy:

### MODERN SLAVERY POLICY

Tranen Pty Ltd, through its Western Australian operating entities Tranen Revegetation Systems and Tranen Revegetation Southwest (Tranen), is committed to compliance with the requirements of the Modern Slavery Act 2018 in its own operations and by its supply chain. Tranen personnel conditions of employment are covered either under a staff contract or The Gardening and Landscaping Services Award 2020, both of which have been certified by the Department of Employment as being Code compliant.

Tranen investigates the risk and compliance within its supply chain as follows:

Type of supply	Tranen's approach to Act compliance
Large suppliers of utilities and services.	All have been checked and have their own policies in place. (e.g. Telstra, Western Power, TPG, Westpac, Caltex).
Small local subcontractors / consultants for the provision of services.	Risk is considered minimal, but all will be advised of this policy and required to conform.
Various suppliers for the provision of goods.	Large suppliers (e.g. Bunnings) have their own policies in place. Smaller suppliers will be advised of this policy and required to conform.

Tranen will undertake its own due diligence of its supply chain to ensure that any occurrences of non-compliance are rectified and notified to its relevant clients.

Tranen will provide training to its employees in this matter as appropriate.

Tranen will produce an annual report documenting activities with respect to the Act to 31 Dec.



Peter Grose  
Managing Director

Under the Act Tranen, with annual revenue of well below the reporting threshold of \$100M, is not required to lodge a formal report. Rather Tranen has produced this report voluntarily, for posting on its website.

## 2 PROPOSED CHANGES TO AND REVIEW OF LEGISLATION

On 8 December 2020, the Customs Amendment (Banning Goods Produced by Uyghur Forced Labour) Bill 2020, a private senator's bill sponsored by Senator Rex Patrick, was introduced into the Senate (Bill). The Bill sought to amend the Customs Act 1901 (Cth) to ban the importation of goods from Xinjiang in China, as well as goods from other parts of China that are produced in whole or part by forced labour.

On 10 December 2020, the Bill was referred to the Senate Foreign Affairs, Defence and Trade Legislation Committee (Committee). On 17 June 2021, the Committee published its report, which made various recommendations which, if legislated, may have a significant impact on Australia's modern slavery regime and customs laws.

However, it appears that to date no legislative changes have been made with respect to this.

As required under Part 4 – Miscellaneous, Item 24 of the Act the Australian Government undertook a statutory review of the Act's operation and compliance over the first three years since commencement. The review commenced on 31 March 2022 and was completed within one year, followed by a report to be tabled in Parliament. Submissions to the enquiry closed on 22 November 2022.

A draft Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Bill 2023 which would amend the Modern Slavery Act 2018 to establish the Australian Anti-Slavery Commissioner as an independent statutory office holder in the Attorney-General's portfolio has been prepared and circulated for comment. The Commissioner's functions would allow the him or her to work with government, business, and civil society to support compliance with the Modern Slavery Act 2018 and complement the roles performed by the Attorney-General's Department and other government agencies to prevent and combat modern slavery.

The deadline for submissions is 22 January 2024.

The reporting date is 21 February 2024.

### **3 COMPLIANCE ACTIVITIES**

#### **3.1 Large Suppliers of Utilities and Services**

As mentioned in the Policy, Tranen has already checked and remains satisfied with the compliance commitments of its major utilities and services suppliers.

The Modern Slavery Act Guidance for Reporting Entities states that such large entities must provide annual Modern Slavery Statements for posting on a central website managed by Australian Border Force (ABF). Tranen does not consider it necessary to check their individual Statements.

#### **3.2 Small Local Subcontractors / Consultants for the Provision of Services**

The following is included in the Tranen purchase order template:

“Tranen requires its suppliers to comply with the Modern Slavery Act 2018”

Subcontractors have been notified of compliance requirements via email.

The majority of our subcontractors are small businesses, many of which are sole traders, and their risk of non-compliance is considered negligible.

Tranen is not aware of any potential breaches which would warrant further investigation.

#### **3.3 Various Suppliers for the Provision of Goods**

As previously mentioned, the following is included in the Tranen purchase order template:

“Tranen requires its suppliers to comply with the Modern Slavery Act 2018”.

The majority of our suppliers are relatively small businesses. Most of them procure items for on-sale to us from large reputable companies, and their risk of non-compliance by them and their supply chains is considered negligible. It is not considered realistic for these small businesses to conduct detailed due diligence of their supply chains. Where possible we order well-known major brand name items from these suppliers, which should minimise the risk of non-compliance.

Tranen is not aware of any potential breaches which would warrant further investigation.

## 4 CONCLUSION

On the basis of the above, I am satisfied that Tranen has done what could be reasonably expected to ensure compliance of its supply chain with the Modern Slavery Act 2018 for the year ended 31 December 2023.



Peter Grose  
Managing Director and Company Secretary