NOTIFICATION OF COLLECTIVE BARGAINING TSG Franchise Network

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1 Notifying party

1.1 Details

Name: TSG Franchise Management Pty Ltd (ACN 052 370 733) (TSG)

Registered Office: Unit 19, 25-39 Cook Road, Mitcham VIC 3132

Telephone No.

ABN: 11 746 942 142 Contact: Simon Ritte

1.2 Business Activities

TSG is in the business of granting to third parties (**TSG Franchisees**) the right to operate a TSG branded tobacco sales business (**Franchised Business**) on such terms set out in a franchise agreement between the parties. The Franchised Business involves the sale of tobacco and tobacco related products, as well as gifts and accessories and general 'convenience store' goods to customers using a system, name and logo designated by TSG. The TSG network of Franchised Businesses is comprised of approximately 470 outlets, most of which are owned and operated by small independent operators.

As a specialty retail seller of tobacco products, TSG Franchised Businesses aim to stock 100% of products from all available suppliers, thereby giving their consumers the widest available range of products to choose from and at all available price points.

2 Details of notified conduct

2.1 Notification

The notified conduct is for collective bargaining (without collective boycott).

TSG wishes to negotiate a supply agreement on behalf of TSG Franchisees with British American Tobacco Australia Limited (**Target**). The notification is intended to apply for a term of three years.

A list of all TSG Franchisees is attached as 'Attachment 1'.

2.2 Details of the notified conduct

As a franchisor, TSG typically negotiates supply agreements with its key suppliers prior to approving the sale of their products within Franchised Businesses. Once a supply agreement has been agreed between TSG and a prospective supplier, that supplier will enter into individual supply agreements with each TSG Franchisee on terms and conditions that are consistent with the agreement that they have reached with TSG.

Supply agreements are ordinarily negotiated for a three year term, and may be extended by agreement between the parties. Where a supply agreement is not in place between TSG and a particular supplier, TSG may (under the terms of its franchise agreement with TSG Franchisees) remove them and their products from its list of approved suppliers (and/or products) which may be sold within a Franchised Business.

Supply agreements within the market for tobacco products cover the usual terms and conditions for the supply of goods, as well as:

- (a) Trading term rebates payable based on the volume of goods sold;
- (b) additional trading term rebates based on the promotion of a supplier's products, usually determined based on the number (or percentage) of products displayed on a price board at a site; and
- (c) Promotional discounts of products that are passed on to consumers which are either paid directly on-invoice (at time of purchase from supplier) and / or deferred through TSG to the retailer at the end of the promotional period (between 1-4 weeks) (**Promotions**).

TSG Franchisees benefit directly from the Promotions offered by tobacco suppliers, and those discounts are passed on to consumers in the form of discounted prices.

The Target is a major supplier of TSG, being one of the three global suppliers of tobacco products. The existing supply agreement between TSG and the Target expired on 1 October 2019, and negotiations between TSG and the Target in respect of a new supply agreement have stalled. The Target has sought to enter separate supply agreements with each individual TSG Franchisee, whilst the TSG Franchisees require TSG (as the franchisor for the network) to complete negotiations with the Target.

Notwithstanding the fact that there is no current supply agreement between TSG and the Target, TSG has not prevented TSG Franchisees from selling the Target's goods in their businesses.

2.3 Rationale for the notified conduct

As matters stand, the primary issue interfering with the finalisation of a new supply agreement between TSG and the Target relates to the Promotions and the qualifying criteria before TSG Franchisees becomes eligible for the discounts for participating in those Promotions.

The terms proposed by the Target are as follows:



A copy of the Target's proposed supply agreement is attached as "Attachment 2" showing the above terms. These terms are commercially sensitive to the Target and TSG Franchisees and disclosure of these terms would unreasonably and adversely affect the Target and TSG in respect of their lawful business, commercial and financial affairs. Therefore, confidentiality is claimed with respect to the above terms and Attachment 2.

The terms that have been proposed by the Target cannot be accepted by the TSG Franchisees. As a specialist tobacconist, a TSG Franchised Business stocks and supplies all tobacco products from all suppliers. In stocking all products from all suppliers, TSG Franchisees have obligations under their respective supply agreements to promote each supplier's products in order to qualify for that supplier's discounts. The Target's terms are problematic because:

- (a) even where <u>all</u> of the Target's products are displayed on a price board, a TSG Franchisee would be required to *remove* another supplier's products from the price board in order to qualify for a discount offered by the Target; and
- (b) in order to qualify for the Target's discounts, a TSG Franchisee would (by necessity) be required to either breach another supplier's supply terms or forego discounts offered by those other suppliers.

TSG and TSG Franchisees consider that it is in the interest of all TSG Franchisees and consumers at large for a network wide supply agreement to be in place. By negotiating collectively, the TSG Franchisees will be able to maximise the discounts offered by all suppliers of tobacco products, including the Target. As set out in section 3.3, the Target holds considerable market share and is one of the three major tobacco suppliers in the global industry. The position it has adopted with respect to Promotions is in itself anti-competitive and will have the effect of:

- (a) reducing consumer choice of tobacco products available for sale, noting that tobacco products cannot be viewable in a store due to strict tobacco advertising laws. This means that if a product does not appear on a price board, it effectively does not exist from a consumer's perspective; and
- (b) increasing the retail price of products manufactured by the Target's competitors (because a TSG Franchisee cannot discount a competitors' product if the TSG Franchisee does not qualify for that supplier's discount).

3 Market information and concentration

3.1 Products, services and geographic areas

The TSG Franchisees supply tobacco and tobacco related products (**Goods**) at approximately 470 locations throughout metropolitan and regional areas of Australia. The location of each Franchised Business is noted in the list of TSG Franchisees in Attachment 1.

TSG Franchisees are independent operators, and where any two outlets are in close geographic proximity to each other they will compete, with price being the major differentiator.

3.2 Competition

TSG Franchisees operate in a highly competitive retail market and compete with supermarkets, independent grocers, petrol stations and other specialist tobacco networks in the sale of the Goods. As smaller independent stores, TSG Franchisees rely on:

- (a) the strength of the TSG network as a whole, and TSG as franchisor, in order to negotiate terms of supply that allows them to compete with supermarkets and service stations in the supply of the Goods; and
- (b) their status as a specialist tobacco retailer, allowing them to compete on the breadth of the range that they offer as a differentiating factor in the marketplace.

The TSG network competes with other specialist tobacco franchises, including Cignall and Freechoice. The networks compete with each other aggressively both in the retail supply of the Goods, but also to attract and retain franchisees and franchised businesses to their network. A network's ability to negotiate with the three major tobacco companies plays an integral role in attracting and retaining franchisees to the network. TSG estimates that it has approximately 35% of the specialist tobacco retail market, and about 8-12% of the total market for the retail sale of tobacco products.

As a highly competitive market, there are relatively low barriers to entry.

3.3 Industry and supply chain

Whilst the retail supply of the Goods is highly competitive, the wholesale supply of tobacco products is dominated by just three major tobacco companies. The Target is the local subsidiary of British American Tobacco Australasia, and competes in Australia with Philip Morris Australia and Imperial Tobacco Australia, who are themselves also local subsidiaries of global companies.

Of the three major tobacco companies, the Target is largest. TSG estimates that in 2017 the Target had 38.2% of the retail cigarette sales by volume¹.

The market share of the two other wholesale suppliers is evenly split, with Imperial Tobacco and Philip Morris each holding approximately 30% each.

4 Public benefit

As set out above, TSG Franchisees compete aggressively on:

- (a) their ability to stock and supply the broadest possible range of Goods available in the marketplace; and
- (b) price, by utilising the discounts available from Promotions and passing on those costs savings to consumers.

In TSG's view, the Target is seeking to leverage its strength in the wholesale supply of the Goods to reduce competition. The Target's proposed supply terms will require TSG Franchisees to forego discounts available to them by other suppliers in order to qualify for the discounts offered by the Target. In doing so, there will be a reduction in the promotion of those

¹ Source: Retail volume share: Euromonitor International. Tobacco in Australia—2016 and 2017. London: Euromonitor International, 2019. Available from: http://www.euromonitor.com/tobacco.

competing products (i.e. a reduction in consumer choice) and an increase in the price of those competitors' products.

5 Public detriment

TSG is not aware of any possible detriments to the public or any reduction in competition in the marketplace arising out of it collectively bargaining on behalf of TSG Franchisees. On the contrary, TSG's position with respect to the supply agreement to be entered into with the Target is aimed at ensuring that the three tobacco suppliers continue to compete aggressively.

6 Contact details

The contact details of the Target are as follows:

British American Tobacco Australia Locked Bag 6000 Potts Point NSW 1335

Tel: (+) 61 29370 1500 Fax: (+) 61 29370 1188

7 Additional information for collective bargaining

7.1 Notifying party

The notifying party confirms that it is not a trade union.

7.2 Contacts details

Attachment 1 sets out the name, phone number and email address of all TSG Franchisees.

7.3 Contracts

TSG confirms that:

- (a) each TSG Franchisee reasonably expects to enter into a supply agreement in respect of the Goods with the Target; and
- (b) the value of that supply contract with not exceed \$3 million in any 12 month period.

8 Declaration by notifying party

The undersigned declare that, to the best of their knowledge and belief, the information given in response to questions in this form is true, correct and complete, that complete copies of documents required by this form have been supplied, that all estimates are identified as such and are their best estimates of the underlying facts, and that all the opinions expressed are sincere.

The undersigned are aware that giving false or misleading information is a serious offence and are aware of the provisions of sections 137.1 and 149.1 of the Criminal Code (Cth).

Signature of authorised person

WERAL MANAGER

Office held

Name of authorised person

This day of November 2019

MON RITTE

Name	Phone	Location
MONYCOM PTY LTD		
DIAMOND BLUE PTY LTD		
Gossner & Williams P/L		
Ocean View Nominees Pty Ltd		
Dragontech Holdings Pty Ltd		
VNN PTY LTD ATF THE NGUYEN & VO FAMILY TR		
LEWEI PTY LTD		
A JAY INVESTMENTS (MACKAY) PTY LTD		
KONDA GROUP PTY LTD		
Karling Trading Pty Ltd		
KE HENG PTY LTD		
W.P.RAI PTY LTD ATF NANDRAI TRUST		

Name	Phone	Location
NQ EXPORTERS PTY LTD ATF J N & L S KELLY		
AUSTRALIA WIDE OCEAN PTY LTD		
TSUNT PTY LTD		
Australia Hongda Pty Ltd		
Sporran Bridget P/L		
FUTIAN AUSTRALIA PTY LTD		
BANORA POINT RETAIL PTY LTD		
SAPUTRA GROUP WHOLESALE PTY LTD		
DICELLO TRADING PTY LTD ATF THE DICELLO FAMILY TRUST		
AHMAD MASRI		
AN MALYTRIC PTY LTD ATF AN MALYTRIC FAMIL		
Maclin Enterprises Pty Ltd		
SINDHIZ PTY LTD ATF THE TRUSTEE FOR SIND		
ZLY INTERNATIONAL GROUP PTY. LTD.		
NEWS PTY LTD		

Name	Phone	Location
EVERPROSPEROUS PTY LTD		
BCF CORPORATION PTY. LTD. ATF THE BCF COR		
Fantab Pty Ltd		
GSBK KELBERG PTY LTD ATF KELBERG BUSINESS		
THE TRUSTEE FOR AURIN UNIT TRUST		
MBC Enterprises PTY LTD		
AO CHENG PTY. LTD.		
TORA AUSTRALIA PTY LTD ATF TORA FAMILY TRUST		
JJJC Investments Pty Ltd Atf JJJC Family		
THREE FRIENDS GROUP PTY LTD		
Biloela Retail Pty Ltd		
Nguyen-Do Pty. Ltd.		
EJ'S SUPERMARKETS PTY LTD		
THANH NHAN LE		
M.F KHELA & M.M MOUSSA		

Name	Phone	Location
Pyramid Investments Pty Ltd		
TAIHE INTERNATIONAL PTY LTD		
KARLMICKMURPH PTY LTD		
GTX First Pty Ltd		
Alqaim Pty Ltd		
Z&J GROUP INVESTMENT PTY LTD		
Maibao Australian Pty Ltd		
DOUBLEEDGED PTY LTD		
SSD FAMILY PTY LTD		
Shellkel Pty Ltd ATF Kelvin Millar Family Trust		
AUSTRALIA MING ZHOU PTY LTD		
Jimmy's Enterprise Pty Ltd		
MING DAO INT'L (AUST) PTY LTD		

Name	Phone	Location
TOBACCO STATION BUNDABERG PTY LTD		
XIAO YING WANG		
MC CELLARBRATIONS PTY LTD		
BALIA CORPORATION PTY LTD		
HUIDA TRADING PTY LTD		
X JIANG & Y YIN		
Cairns Premier Tobacco Station Pty Ltd		
LARNACA PTY LTD ATF LALA TRUST		
DEVCHAND KALYAN PTY LTD		
SINDHIZ PTY LTD ATF SINDHIZ FAMILY TRUST		
Westfield News		
CHIV SUPERMARKETS PTY LTD ATF CHIV SUPERM		
MND HOLDINGS PTY LTD		

Name	Phone	Location
Northern Lotto PTY LTD		
KYROLLOS 4M PTY LTD		
MR Traders PTY LTD		
Orlando Logistics Pty Ltd		
SHENJUN FAMILTY PTY LTD ATF LIU & XU FAMI		
KT SUNRISE PTY LTD ATF VU FAMILY TRUST		
The Trustee for Wei & Yu Family Trust		
HELV INTERNATIONAL PTY LTD		
SAM CHEN PTY LTD		
WALCAT PTY LTD ATF WBJ & CA FAHEY FAMILY		
Bedieb Pty Ltd		
TSG CENTRAL PTY LTD		
PDSL COMPANY PTY LTD		

Name	Phone	Location
The Trustee for KDS Family Trust		
SINDHIZ PTY LTD ATF SINDHIZ FAMILY TRUST		
JPS NQ PTY LTD		
Forever Prosperous Pty Ltd		
G & F TRADING PTY LTD		
BI LI HUANG		
SINDHIZ FAMILY TRUST		
P J MARSH & S M WOOLLEY		
TSG CLARENCE STREET PTY LTD		
Heather Vo		
Peter Politis Pty Ltd		
OWN BOSS PTY LTD		
T AND TC PARTNERS PTY LTD		
JY CORPORATION PTY LTD		
IGARDEM PTY LTD		

Name	Phone	Location
QISHUOCHEM PTY LTD		
Maude & Sons Pty Ltd		
The Trustee for KES Trust		
Phoenix Pd Pty Ltd		
Jehovah Shaloom Pty Ltd		
ST ALPHONSA PTY LTD		
SINDHIZ PTY LTD ATF SINDHIZ FAMILY TRUST		
LUCKY T AND TC PARTNERS PTY LTD		
AVT GROUP PTY LTD ATF TAN Family Trust		
HF GIFTWARE PTY LTD		
CB 85 ENTERPRISES PTY LTD		
Doubbleheader Pty Ltd		
JUPITER STAR HOLDINGS PTY LTD		
G E SLATER & L M SLATER		
Kovtex Pty Ltd		
T XU & Y.J Zhang		

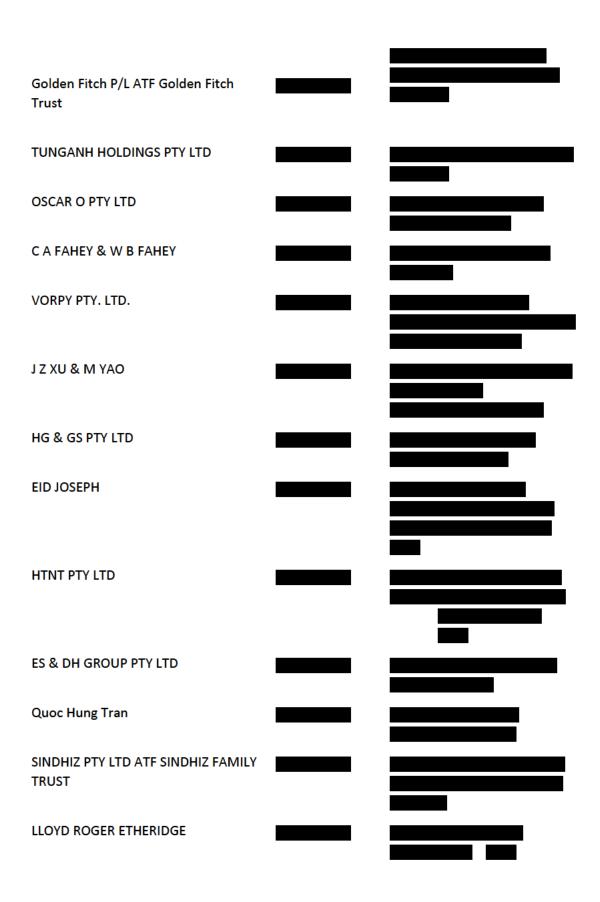
Name	Phone	Location
	•	
OSCAR LIANG P/L		
Yakko Australia Pty Ltd		
·		
MARAMI HOLDINGS PTY LTD		
	i	
Sindhiz Pty Ltd Atf Sindhiz Family Trust		
CHRISTOPHER ALFRED JOHN YURA KADNIAK		
HANTING INTERNATIONAL PTY LTD		
LW/N PT/ LTD		
J WIN PTY LTD		
DICELLO TRADING PTY LTD ATF THE		
DICELLO FAMILY TRUST		
J L PAVEY & R E PAVEY		
MAYGAO PTY LTD		
	i	
PALMA PTY LTD		
FORTUNE REACH PTY LTD		

Name	Phone	Location
WELSTA PTY LTD		
RETKA PTY LTD		
Le Thi Nga		
PIRKEBNER TRUST, TRADING AS GLITTER ANGEL		
TSG DEVONSHIRE PTY LTD		
Own Boss Pty Ltd		
PM & AA Penn		
Lytham Pty Ltd		
LIN AND SUN PTY LTD		
G & M SUNRISE PTY LTD		
Unitier Pty Ltd		
MARKELE PTY LTD		
PRADIP KHATRI and USHA KHATRI		
BE & UT HOLDINGS		
AU-SH RED EXPRESS CO. PTY LTD		

Name	Phone	Location
JD & JD PTY LTD		
Edwin Dario Franco Cortez		
TD&J PTY LTD ATF A & A FAMILY TRUST		
Dencin Pty Ltd		
BRUCE HOLMES AND DAWN LEO		
Unionstream International Pty Ltd		
Peaso NQ (Edmonton) PTY. LTD.		
ONKAR ENTERPRISES PTY LTD		
MEGCORE PTY LTD ATF THE MEGCORE TRUST		
Six Star International Pty Ltd		
KRIS & RYAN PTY LTD		
EMERALD TOBACCO RETAIL PTY LTD		
Brilliant World Pty Ltd		
THE MARCUS FAMILY TRUST		

Name	Phone	Location
COORAY ENTERPRISES PTY LTD		
MJ Ely & ME Fiddock		
SAPUTRA GROUP PTY. LTD.		
PEASO NQ PTY LTD		
St Moura Trading Pty Ltd		
BOCHAO PTY LTD		
HE, WEI MIN		
ES & DH GROUP PTY LTD		
WEI LIANG LI		
JAINCO INTERNATIONAL P/L		
Flinders Smoke Pty Ltd		
PHUONG THI TRUC LE		
I & JM Chambers Investments Pty Ltd		
AUSTCHINA HARVEST PTY LTD		

Name	Phone	Location
MEIGO Heaven Pty Ltd		
ALPAS INTERNATIONAL PTY LTD		
IMAD BKOOR		
SAPUTRA FAMILY PTY LTD		
Risteski Pty Ltd ATF The Risteski Family		
TSG GEORGE STREET PTY LTD		
J A LLOYD & S S LLOYD		
Hien Hoang Nguyen		
Liling Pty Ltd		
AUSTRALIA STYLE PTY LTD		
Townside Video Glen Innes Pty Ltd		
SMOKE EXPRESS PTY LTD ATF SOHAIB AL MASRI FAMILY TRUST		
Lo's First Choice Pty Ltd		
COULTON ENTERPRISES PTY LTD		



Name	Phone	Location
8STIX PTY LTD		
MS MONA PTY.LTD.		
INTERLINK PLUS PTY LTD		
MAHESH BUSINESS PTY LTD ATF AARDIA FAMILY		
DECKS TRANSPORT PTY LTD		
AMARAH GROUP PTY LTD		
PEASO NQ (HERMIT PARK) PTY LTD		
PTHN PTY LTD		
BROSIS BUSINESS PTY LTD		
VINDOW PTY LTD		
KAHAN PTY LTD		
BB Family Pty Ltd		
N & T GROUP PTY LTD		
PLENTEOUS WONDERS PTY LTD		

Name	Phone	Location
Gujin Wang		
DOUBBLEHEADER PTY LTD		
DOUBLEEDGED PTY LTD		
RAGOBERT AND CASOTTI PTY LTD		
Jose & Miryam Velez		
N.Q EXPORTERS P/L ATF THE TRUSTEE FOR THE		
FAQEERI PTY LTD		
Invermay Newsagency Pty Ltd		
LUCKY T AND TC PARTNERS PTY LTD		
SINDHIZ PTY LTD ATF SINDHIZ FAMILY TRUST		
Marami Holdings Pty Ltd		
GA & SJ LEAL		
SAPUTRA ENTERPRISES PTY LTD		
Barry Kent		
KAWANA RETAIL PTY LTD		

Name	Phone	Location
KAMAL NOURI		
TSG KENT STREET PTY LTD		
JY AUST PTY LTD		
ZDK PTY. LTD.		
DALFIVE PTY/LTD/ ATF THE DALFIVE FAMILY T		
E AND G PARTNERS PTY LTD		
TTFT MACALPINE FAMILY TRUST		
TSG KINGS CROSS PTY LTD		
J C & M R DUNK PTY LTD		
KINGSCLIFF RETAIL PTY LTD		
MARAMI HOLDINGS PTY LTD		
BODAKOLE PTY LTD ATF GERANDONIS FAMILY TRUST		
SINDHIZ FAMILY TRUST		
KIRKWOOD RETAIL PTY LTD		

Name	Phone	Location
ASP NQ PTY LTD		
TPC (AUST) PTY LTD		
Phoenix Tobacco Pty Ltd		
BENAVALE PTY. LTD. ATF FITZGERALD FAMILY		
Kyabram Discounts Pty Ltd		
MARC JEFFREY DEGNAN		
S & M TOBACCO PTY LTD		
IVIVO PTY LTD		
TRUONG, TIEN		
R.L TAYLOR & S TAYLOR & S.L TAYLOR		
BROTECK (AUSTRALIA) PTY. LTD.		
Walcat Pty Ltd		
SINDHIZ PTY LTD ATF SINDHIZ FAMILY TRUST		
Luay Mizer		
TSG LIVERPOOL STREET PTY LTD		

Name	Phone	Location
Phillip Marsh & Sally Woolley		
888 PARTNERSHIP PTY LTD		
E AHLAWAT & H MEMON		
Longford news pty ltd		
Max Behrendt		
Golden Horse Peak Pty Ltd		
Tongling Tobacco PTY LTD		
Rodiya Enterprises Pty Ltd		
DEUTSCHER HOLDINGS CORPORATION (QLD) PTY LTD		
TSG MANLY PTY LTD		
LW TRADING PTY LTD		
ASP NQ PTY LTD		
Wallabianca Pty Ltd		
TUGBOAT INTERNATIONAL PTY LTD		

Name	Phone	Location
A JAY INVESTMENTS (MACKAY) PTY LTD		
JC GLOBAL GROUP PTY LTD		
DEVCHAND KALYAN PTY LTD		
POCA PTY LTD ATF THE POCA TRUST		
B.M FIORINI & D. A FIORINI		
FJORDLAND P/L ATF THE MCLEOD FAMILY TRUST		
JIN 15 PTY LTD ATF THE TRUSTEE FOR BRYDON		
CNKN PTY. LTD. ATF THE NARSEY BUSINESS TR		
DONAPHIL PTY LTD		
BIG-CASA P/L ATF I & J CASAGRANDA FAMILY		
Alan Taylor		
BLUE STONE PTY LTD		
Miami Retail Pty Ltd		
SUNGARS AUSTRALIA PTY LTD		
3T TRANSPORT PTY LTD ATF LUU FAMILY TRUST		

Name	Phone	Location
PEASP NQ (MISSION BEACH) PTY. LTD.		
SINDHIZ PTY LTD ATF SINDHIZ FAMILY TRUST		
TTF HORTIS FAMILY TRUST		
KDR HOLDINGS PTY LTD		
LINGNA PTY LTD		
R & A HOLDINGS P/L ATF R & A HOLDINGS UNI		
The Trustee for KDS Family Trust		
SHARDA INVESTMENTS TRUST		
Prosperous Union Pty Ltd		
GJ International P/L		
SCAPELEE PTY. LIMITED		
KEGEE PTY LTD		
PRMT Pty Ltd		
New Super Lucky Pty Ltd		
A Jay Investments (Mackay) Pty Ltd		

Name	Phone	Location
CLOHESY PROPERTIES PTY LTD		
KHUSSHAY PTY LTD		
DICELLO TRADING PTY LTD ATF THE DICELLO FAMILY TRUST		
Baili Investment Pty Ltd		
BENQ PTY LTD		
BENGFITEID		
SRS CAPITAL PTY. LTD		
T & L Smith Investments P/L Atf the trust		
VINDIDO P/L		
LIANG PENBERTHY PTY LTD		
LONG BONANZA PTY LTD		
L FOSTER & M.L MARTIN		
JF YUAN PTY LTD		
AS INFINITY PTY LTD		
PERFECT VISUAL PTY LTD		
TUGBOAT EMPIRE PTY LTD		

Name	Phone	Location
AUSTRALIA WMJ PTY LTD		
JKT PTY LTD		
Garry Martin		
HZ GROUP PTY LTD		
LUSAM (NORTH SHORE) PTY. LTD.		
Auschina Direct Pty Ltd		
Whitby Investments Pty Ltd		
, , ,		
JACK & FAN PTY LTD		
Krishnav Trading		
Nundah Retail Pty Ltd		
ALLIE REID		
JONATHAN WENG		
Mourad Trading Pty Ltd		
MACKAY RETAIL PTY LTD		
Joseph Eid		

Name	Phone	Location
A&R FORTUNE PTY LTD		
TSG OXFORD STREET PTY LTD		
JEMMCO PTY LTD ATF JM TRUST		
TUGBOAT EMPIRE PTY LTD		
STELL PTY LTD ATF ZHAO & CHENG FAMILY TRU		
JOY & ROY PTY LTD ATF BEN FAMILY TRUST		
FUFARM CO PTY LTD		
THI UYEN HA PHAN		
POCA PTY LTD ATF THE POCA TRUST		
PARK STREET RZRH PTY LTD		
I & J Chambers Investments Pty Ltd		
ASP NQ PTY LTD		
Z Q MAO & Z XU		
NAN LI		

Name	Phone	Location
Sygna Pty Ltd ATF Santoso Family Trust		
JSY International Pty Ltd		
TSG PITT STREET PTY. LTD.		
BHATI PTY LTD		
MING HAI XU		
AMAL RADI		
A DAHER & M DAHER		
Jay Hind SuperMarket Pty Ltd		
SINDHIZ PTY LTD ATF SINDHIZ FAMILY TRUST		
O'DONNELL'S LAKESIDE NEWSAGENCY		
P/L		
LIGHTHOUSE OCEANIA PTY LTD		
888 PARTNERSHIP PTY LTD		
OWN POSS PTV LTD		
OWN BOSS PTY LTD		
Tobacco Station (Aus) Pty Ltd		

Name	Phone	Location
PING YU & FIFI WU		
ABDUL RAHMAN, ADAM		
FORTUNE REACH PTY LTD		
HELEN & CO PTY LTD		
PHOLE PHOLE ENTERPRISES PTY LTD ATF NAEEM ISMAIL FAMILY TRUST		
Nature's Puff Pty Ltd		
Luck Lifestyle Pty Ltd		
EJ'S SUPERMARKETS PTY LTD		
SMOKEN ENTERPRISES PTY LTD		
ROMA RETAIL PTY LTD		
David & Maria Hassett		
GARDENIA GROUP PTY LTD		
Z.M.T PTY LTD		
LAN JING P/L		

Name	Phone	Location
GJ JAISINGHANI FAMILY TRUST		
J.Young International Pty Ltd		
Karyn Gilligan		
ASP NQ PTY LTD		
H. & K MORTON PTY. LTD. ATF H AND K MORTO		
VSVP PTY LTD		
Ibrahim Abdou		
WHEL HOLDINGS PTY LTD		
TAI CHI CAPITAL PTY LTD		
B.Q.Z P/L,THE ZHANG BAOQIANG FAMILY TRUST		
LW TRADING PTY LTD		
Nilkant Pty Ltd		
OWN BOSS PTY LTD		
Alan & Heidi Pty Ltd		

Name	Phone	Location
PALMER4 PTY LTD ATF PALMER FAMILY TRUST		
BROWN & GOLD ENTERPRISES PTY LTD		
TUGBOAT INTERNATIONAL PTY LTD		
TTFT PT LIONETTI FAMILY TRUST		
Australia Yangxin Pty Ltd		
Shun Yu International Pty Ltd		
BCL Springvale Pty Ltd		
VIET UC PTY LTD		
AUSTRALIA IMPETUS PTY LTD		
SUNIK PTY. LTD.		
J & D Stores Pty Ltd		
EASTLYN PTY. LTD. ATF THE BENTLEY FAMILY		
BE & UT HOLDINGS		
Zara Family Trust		
D CLARK & J CLARK		

Name	Phone	Location
HZ GROUP PTY LTD		
NEW SKY TRADING PTY LTD		
PLAZA RETAIL PTY LTD		
TSG SURRY HILLS PTY LTD		
TOBACCO STATION TAIGUM		
Queensland Tobacco Pty Ltd		
R.L TAYLOR & S TAYLOR & S.L TAYLOR		
Harvest Wisdom Pty Ltd		
Plenteous Wonders Pty Ltd		
HOYLE TRADING PTY. LTD.		
Tannoury Pty. Ltd. ATF Tannoury Family Trust		
MICK AND Z HOMES PTY LTD		
AUSTRALIA YONGXIN P/L ATF SUN & ZHU TRUST		
LYNMAR INVESTMENTS (QLD) PTY LTD ATF CLAU		
JOHN HENRY & SHARON ANNE COPELAND		

Name	Phone	Location
The trustee for nature land family trust		
SANDS FOURTH ESTATE PTY LTD		
TTFT NASH FAMILY TRUST		
ASHTON AVENUE PTY LTD ATF ASHTON AVENUE T		
THE WINTER FAMILY TRUST		
THE WINTER FAMILY TRUST		
Deecoy Investments Pty Ltd.		
G & C GARTH INVESTMENTS PTY LTD		
G.D HALL & S.L WHITELEY		
Randsvas Pty Ltd		
STONEY CREEK GROUP PTY LTD		
YOUSSEF FAM TRUST T/A TAMAV ERINY PTY LTD		
CHO & LEE PTY LTD		
SAPUTRA GROUP WHOLESALE PTY LTD		

Name	Phone	Location
CJ & RS ROOKE		
TTF MEGCORE TRUST		
WELLINGTON INTERNATIONAL P/L		
REEFOREST INTERNATIONAL PTY LTD		
J K DAMODAR PTY LTD ATF JK DAMODAR TRUST		
LUSAM PTY LTD		
OSCAR O PTY LTD		
SMPM FRIENDS PTY LTD ATF SMPM FRIENDS FAMILY TRUST		
STRINGER FAMILY PTY LTD		
JIACHENG AUSTRALIA PTY LTD		
REYNOLDS, GRANT M		
DEUTSCHER HOLDINGS CORPORATION (QLD) PTY LTD		
WHALE MELBOURNE PTY LTD		
HAN QIAN PTY LTD		

Name	Phone	Location
E&E AUSTRALIA TRADING PTY LTD		
SINDHIZ PTY LTD ATF SINDHIZ FAMILY TRUST		
WENTWORTH AVE TOBACCO PTY LTD		
F FAYAD & N PATEL		
WANFUDA AUSTRALIA PTY LTD		
Marami Holdings Pty Ltd		
OTIS MAISON PTY LTD		
ASP NQ PTY LTD		
BOBROSS PTY LTD		
YONGHONG TRADING PTY LTD		
F FAYAD & J.P FAYAD		
POCA PTY LTD ATF POCA TRUST		
David Carr		
LE L&T PTY LTD		
V & T GROUP PTY LTD		

Name	Phone	Location
THE WINTER FAMILY TRUST		
KHUSSHAY PTY LTD ATF KAK TRUST		
Abhi Investments Pty Ltd		
SRS INTERNATIONAL GROUP PTY LTD		
VICKI BAILEY		
Marami Holdings Pty Ltd		
T M TRAN & T T LE		
TSG WOLLI CREEK PTY LTD		
KAWA KAWA P/L		
T AND TC PARTNERS PTY LTD		
SINGULAR AUSTRALIA PTY LTD		
Coman Enterprises Pty Ltd.		
Mocke Pty Ltd Atf The Trustee C & C Mock		
Lim Patner Corporation Pty Ltd		

Name	Phone	Location
KADNIAK, TONY PAUL		
WEALTHY HEALTHY INTERNATIONAL		
D.A MCGURREN & G.J MCGURREN		
CAPCOAST TOBACCO PTY LTD		
SINDHIZ PTY LTD ATF SINDHIZ FAMILY TRUST		

See attached.