

A worker in a yellow high-visibility vest and white hard hat is working on a large, rusty metal component of a machine. The worker is using a tool to adjust or inspect the component. The background shows more of the machine and a red vertical pipe.

MODERN SLAVERY

WESTRAC'S ANNUAL MODERN SLAVERY STATEMENT (FY25)

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Modern Slavery Statement

WesTrac opposes all forms of modern slavery and is committed to lawful, ethical operations that respect human rights. Actions in FY25 reflect WesTrac's commitment to its values, ethical conduct, and maintaining operations and a supply chain that is free from modern slavery.

Reporting Entity

This Annual Modern Slavery Statement has been prepared for WesTrac Pty Ltd (ABN 63 009 342 572), located at 128-136 Great Eastern Highway, South Guildford, WA 6055 (**WesTrac**), and its wholly subsidiaries (together, **WesTrac Group**).

Reporting Entity Structure, Operations and Supply Chain

Structure

WesTrac is a wholly owned subsidiary of SGH Limited (**SGH**), ABN 46 142 003 469, headquartered at Level 30, 175 Liverpool Street, Sydney, NSW, 2000. WesTrac subsidiaries include SITECH (WA) Pty Ltd, SITECH Solutions Pty Ltd, and Warrah Engineering Pty Ltd. WesTrac also has a material interest in Energy Power Systems Australia Pty Ltd.

Operations

WesTrac is the exclusive dealer of Caterpillar equipment in WA, NSW and the ACT operating from 30 branches within these territories. As of 30 June 2025, WesTrac employed approximately 4,900 people including team members on common law contracts, enterprise bargaining agreements, and through labour hire arrangements. With a large geographical footprint and a diverse client base, WesTrac provides customers with a wide range of Caterpillar earth moving machinery and construction equipment, including responsible finance options and comprehensive whole-of-life management solutions.

Supply Chain

The majority of goods procured by WesTrac are sourced from Caterpillar for resale and include heavy machinery and components for construction and mining applications. Caterpillar is a global group headquartered in the USA with manufacturing operations in multiple countries. Goods sourced from non-Caterpillar suppliers include items used to modify, service, or maintain Caterpillar equipment such as fire suppression systems, lubrication systems, lighting solutions, communication equipment, technological solutions, hardware, and operational consumables.

Goods are also procured to support business operations including tooling, stationery, clothing, merchandise, IT, and communication hardware. Additionally, suppliers are engaged to perform installations and modifications to Caterpillar equipment at WesTrac branches as needed.

Modern Slavery Risk in Operations and Supply Chain

Operations Risk

WesTrac has assessed the risk of modern slavery in its operations as low. However, WesTrac considers that there is a higher risk of modern slavery within the operations of service labour hire providers, contract services, and international recruitment providers.

90.6% of WesTrac's workforce is employed directly by WesTrac in accordance with Australian laws, applicable modern awards, and enterprise agreements. 9.4% of WesTrac's workforce is engaged indirectly through labour hire and contract service providers. WesTrac requires that labour hire providers meet all applicable laws.

Supply Chain Risk

The modern slavery risk associated with goods sourced from Caterpillar is assessed as being low due to the stringent controls that Caterpillar has in place. Caterpillar has undergone its own due diligence to investigate modern slavery risks in its supply chain and has published a [Slavery and Human Trafficking Statement](#), [Modern Slavery Statement](#), and [Human Rights Policy](#).

Overall, WesTrac has assessed the risk of modern slavery associated with Caterpillar and its non-Caterpillar suppliers as low.

Actions Taken by WesTrac to Assess and Address Modern Slavery Risks

During FY25, WesTrac distributed Supplier Assessment Questionnaires (SAQs) to key suppliers operating within high-risk service categories, including commercial cleaning services, laundry services, and security services.

The responses received from these suppliers indicated that their operational practices were aligned with WesTrac's values and compliance requirements concerning modern slavery. Importantly no indicators or evidence of modern slavery were identified. WesTrac remains committed to

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proactively addressing modern slavery risks and continues to implement measures to ensure ethical practices within its operations and supply chain.

Governance

WesTrac has implemented a comprehensive framework of policies and codes designed to uphold ethical conduct and align operational and supply chain practices with the objective of eliminating modern slavery. The framework includes WesTrac's Code of Conduct Policy and Supplier Code of Conduct Policy. Each of these are based on WesTrac's core values and set out clear expectations and standards for both suppliers and employees.

Additionally, WesTrac's Modern Slavery Policy, outlines WesTrac's obligations and remediation process to be followed if modern slavery is suspected.

Employee Training

During FY25, nominated members of WesTrac's National Procurement Team completed modern slavery training designed for companies addressing modern slavery in their operations and supply chains. The course provided practical guidance on the supply chain reporting requirements set out in Australia's Modern Slavery Act and is supported by Anti-Slavery Australia.

Reporting and Remediation

WesTrac has a clear process for reporting and remediating modern slavery within its supply chain, supported by WesTrac's Modern Slavery Policy. Any person who suspects any form of modern slavery is to report the incident to WesTrac's General Manager of Risk, Safety, and Security. Any suspected occurrence of modern slavery will be independently investigated to ensure impartiality in the investigation and remove any actual or perceived conflict of interest. Anonymous and external reporting is available should the reporting party desire anonymity through RightCall, which is WesTrac's external whistle-blower reporting hotline. Any submission received by RightCall is investigated independent of WesTrac and SGH.

If an occurrence of modern slavery is discovered, WesTrac will follow best practice guidance.

Supplier Covenants

WesTrac's standard terms and conditions for the purchase of goods and services include various covenants and warranties

regarding modern slavery risk. Suppliers are required to warrant that they have thoroughly investigated their labour practices, and those of their direct suppliers, to ensure there is no modern slavery within their supply chains. WesTrac has confidence in compliance by having the right to audit suppliers.

Community Engagement

During FY25 WesTrac continued its active participation in a modern slavery working group alongside SGH entities. The working group meets quarterly to share best practices and insights on identifying and managing modern slavery risks.

The working group continues to expand its knowledge library to support group members in strengthening their understanding of modern slavery risks.

Supplier Checks and Monitoring

Supplier selection and onboarding due-diligence checks are undertaken on all new suppliers to ensure that suppliers are aligned to WesTrac business ethics and values; and have appropriate processes and controls in place to manage modern slavery risks. Onboarding checks vary and are tailored dependent on the supplier category, supplier location, and services to be provided.

Assessing Effectiveness of WesTrac Actions

WesTrac's actions and effectiveness for FY25 have been continuously monitored and reviewed by the Modern Slavery Steering Committee. Deficiencies or improvements are addressed as they arise and opportunities for continuous improvement identified.

Consultation

WesTrac company representatives were consulted in the development of this statement to ascertain the modern slavery risk in the supply chain, and to ensure that information provided is true and correct.

Further Information

For further information regarding WesTrac's Modern Slavery Statement and actions please contact WesTrac's Company Secretary at SMB-companysecretary@westrac.com.au.

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WesTrac



Board Approval

This statement was approved by the board of WesTrac Pty Ltd on Wednesday, 29 October 2025.

A handwritten signature in black ink, appearing to read 'Jarvis Croome', with a horizontal line underneath.

Jarvas Croome

Director and Chief Executive Officer

Friday, 31 October 2025.