

**WesTrac**  
Annual Slavery Statement FY23





### Modern Slavery Statement

WesTrac opposes all forms of modern slavery and is committed to operating its business lawfully, ethically and in respect of human rights. The actions undertaken during FY23 underpin WesTrac's commitment to uphold its values and ethics, take responsibility for its behaviours, and act on its commitments to provide a value chain that is free from all forms of modern slavery.

### Reporting Entity

This Annual 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 owned subsidiaries (together, WesTrac Group).

### Reporting Entity Structure, Operations and Supply Chain

#### Structure

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

#### Operations

WesTrac is the sole dealer of Caterpillar equipment in WA, NSW and the ACT operating from 29 branches within these locations. As of 30 June 2023, WesTrac employed approximately 4,800 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.

WesTrac procures numerous services from external providers. These service providers manage and support WesTrac's operations by providing facility and property management services, IT support, and corporate services. Suppliers are engaged to complete installations and modifications to Caterpillar equipment at WesTrac's branches as required.

Almost all purchases with non-Caterpillar suppliers during FY23 were sourced directly from Australian based businesses. Although these businesses are monitored for modern slavery risk, the majority of these suppliers are distributors of products manufactured by other businesses with often complex supply chains.

### 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. Accordingly, this was the focus of the FY23 review.

86.5% of WesTrac's workforce is employed directly by WesTrac in accordance with Australian laws, applicable modern awards, and enterprise agreements. 13.5% 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 its own [Slavery and Human Trafficking Statement, Australian Modern](#)

[Slavery Statement](#), and [Human Rights Policy](#).

The modern slavery risk associated with non-Caterpillar suppliers is also assessed as being low.

### **Actions Taken by WesTrac to Assess and Address Modern Slavery Risks**

During the course of the year, WesTrac was made aware that certain practices of one of its recruitment services suppliers may not have been aligned to WesTrac values. WesTrac no longer uses this supplier. More generally, WesTrac has taken a number of actions to control the risk of modern slavery within its operations and supply chain.

#### **Governance**

WesTrac has enacted appropriate policies to ensure behaviours and values support the absence of modern slavery in WesTrac's operations and supply chains. A Modern Slavery Policy is in place to outline WesTrac's obligations and remediation process should an occurrence of modern slavery be suspected in its operations or supply chain. WesTrac's Code of Conduct and WesTrac's Supplier Code of Conduct requires employees and Suppliers to comply with WesTrac values and ethical standards.

#### **Employee Training**

Employee training has been held to assist in early identification of modern slavery in the supply chain. Additionally, learnings from each year's reviews and actions are cascaded throughout the business.

#### **Reporting and Remediation**

WesTrac has a clear process relating to the reporting and remediation of modern slavery within its supply chain. This process is 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 investigated by a third party due-diligence team 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 set out by the [Walk Free Foundation](#) and [UN Guiding Principles](#).

#### **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 is able to ensure compliance by having the right to audit suppliers.

#### **Community Engagement**

During FY23 WesTrac and SGH entities including Boral, Coates, SGH, Beach Energy, Seven West Media, Allight, Sykes, and Energy Power Systems Australia continued to hold quarterly meetings to share learnings in relation to the identification and management of modern slavery risk.

The working group expanded its knowledge library that includes supplier assessment results, supplier risks, and supplier remediation efforts, along with relevant supplier communications. Resources and references have been compiled to allow group members to gain further understanding of modern slavery in the supply chain and provide points of contact for assistance as required.

#### **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.

In addition to supplier selection and onboarding due-diligence checks, WesTrac has introduced additional periodic due-diligence checks for current vendors to ensure that vendors continue to remain compliant post onboarding.

#### **Assessing Effectiveness of WesTrac Actions**

WesTrac's actions and effectiveness for FY23 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 are identified.

**Consultation**

WesTrac Group 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 the Company Secretary at [companysecretary@westrac.com.au](mailto:companysecretary@westrac.com.au).

**Board Approval**

This statement was approved by the board of WesTrac Pty Ltd on Tuesday, 31st October 2023.

**Jarvas Croome**

Director and Chief Executive Officer

Tuesday, 14th November 2023