

WALKER GROUP MODERN SLAVERY STATEMENT For the 2020 Financial Year



Walker Corporation supports the introduction of the *Modern Slavery Act 2018 (Cwlth)* (**Act**) to promote transparency in business supply chains, and to protect the human rights of its employees, customers, tenants, communities and those within its supply chains.

As at 30 June 2020, Walker Corporation Pty Limited (ACN 001 176 263) and Walker Group Holdings Pty Limited (ACN 001 215 069) are identified as reporting entities for the purposes of the Act.

This is the first modern slavery statement for Walker Corporation Pty Limited as Trustee for the LA Walker Family Trust and its controlled entities, and Walker Group Holdings Pty Limited and its controlled entities, and all related entities (together referred to as **Walker**).

This statement:

- is submitted as a joint statement on behalf of these entities, made pursuant to section 16 of the Act;
- explains the actions Walker is taking to assess and address modern slavery risks in our operations and supply chains during the financial year ending 30 June 2021; and
- has been approved by the Board of Walker Corporation Pty Limited and Walker Group Holdings Pty Limited.

1 About Walker

Walker is one of Australia's largest private, diversified property development companies, with over 50 years' experience in the delivery of over 1000 projects throughout Australia, and in America, Canada, Fiji and Malaysia.

Walker is one of the few developers with expertise across all property sectors, from residential through to master planned communities, retail, commercial, industrial and resort living, with a strong emphasis on the developments being community focused, and incorporating leading edge engineering, technology and ecologically sustainable development practices.

2 Walker's supply chain

2.1 Corporate Operations

Walker's head office is based in Sydney, with a centralised system for the engagement of products and services to assist with head office operations, and administering Walker's business.

As at 30 June 2020, Walker's direct workforce was comprised of over 600 employees across various business functions, including projects, asset management, development, legal, finance, and hospitality, and located in Australia, Malaysia and Fiji. Walker's employees are paid a remuneration package which is competitive within the relevant market.

2.2 Development and Projects

Walker engages suppliers and consultants in connection with the development of its assets, and large capital expenditure projects. Suppliers range across the full development process, and include design, construction, planning and project management.

2.3 Asset Management

External service providers are a key part of Walker's supply chain, and provide services for the maintenance of our properties and communities. These include the engagement of potential high-risk services such as cleaning, security, and maintenance and building services.

3 Risk Identification and Assessment

Walker is in the early stages of identifying and assessing risk in its operations and supply chains, and is consulting with Walker subsidiaries, key stakeholders, and the relevant heads of business units, in order to identify and assess modern slavery risks in high-risk supply chains for the group, and to develop measures to address those risks.

As at the date of this statement, the following areas of risk have been identified:

3.1 Health & Safety

Walker recognises the importance of Work Health and Safety and potential risks in its workplaces, and has implemented a Workplace Health & Safety Policy to address risks in our direct operations. In addition, we require that all suppliers and their supply chains observe clear workplace health and safety requirements when working on our projects.

3.2 Sector and industry risks

Walker engages a number of high-risk services as part of its property management services (eg cleaning and security services). These services have an inherent risk to modern slavery as these positions often have lower wages, involve manual labour and are frequently on a casual basis. Workers also often are from migrant, low socio-economic, or culturally or linguistically diverse backgrounds.

Walker also engages a number of contractors within the construction industry. The construction industry has experienced longstanding demand for low-skilled, manual, often migrant labour, which makes it particularly vulnerable to modern slavery practices.

We have sought to address these risks by undertaking relevant due diligence on proposed new suppliers, and requiring that all supplier contracts contain modern slavery provisions.

3.3 Geographical risk

Geography is a key risk consideration in light of Walker's operations in Malaysia and Fiji, where there are variable regimes, lower labour costs and limited worker rights.

To mitigate against such risks, remuneration for Walker employees in Malaysia and Fiji is in line with local market conditions and in compliance with the relevant laws and regulations. We continue to seek increased transparency around labour conditions in our supply chain and through subcontractors to address any modern slavery risks.

4 COVID-19

COVID-19 impacted on our ability to fully implement some of our key actions, with focus largely centred on the creation of operational safety and contingency plans.

Walker implemented comprehensive COVID-19 safe procedures and guidelines in workplaces as set out in the COVID-19 Policy, which includes measures for social distancing, personal screening response protocols for confirmed cases, hygiene measures as well as shutdown, hibernation and re-start protocols.

We intend to continue to develop identified key actions, and deliver modern slavery training during FY22 to increase employee awareness and understanding of the modern slavery risks in our day to day operations.

5 Key Actions to Address Modern Slavery Risks

Walker is undertaking a number of actions in order to address the risks of modern slavery in its operations and supply chains, including:

- [Supplier engagement](#)

Walker has developed a modern slavery framework within existing procurement processes for suppliers of high-risk services. Such framework includes communicating with tenderers within high-risk supply chains on Walker's requirements to address the risks of modern slavery and including supplier acceptance of modern slavery contractual compliance within tender evaluations for high-risk supply chains.

- [Contracts and template clauses](#)

Walker has introduced modern slavery contractual conditions into supplier contracts within high risk supply chains.

Additionally, supplier contracts are being revised to require suppliers to comply with all relevant modern slavery laws, and to notify Walker if they become aware that they have engaged, or any of their subsidiaries, sub-contractors or suppliers have engaged, in modern slavery practices.

- [Corporate policies and grievance processes](#)

Walker has established a number of internal policies to support its commitment to responsible work practices, such as the Modern Slavery Policy, Workplace Health & Safety Policy.

- [Grievance processes](#)

Walker is in the process of establishing the following mechanisms where concerns of suspected or actual illegal activity (such as modern slavery) can be reported:

- **Whistleblower Policy** – this will encourage the reporting of any misconduct or an improper state of affairs or circumstances, including any illegal activity by Walker employees, directors, suppliers and relatives of those individuals.
- **Code of Conduct** – this will require the reporting of any unlawful or unethical behaviour or a breach of the Code of Conduct to be reported to the head of the relevant business unit and Chief Executive Officer.



6 Measuring effectiveness

We will continue to progress our assessment of potential modern slavery risk in our operations and supply chains, and the development of countermeasures to address those risks. This will include continued engagement with suppliers, examining the due diligence processes for new contractors and suppliers, the finalisation of further policies, and employee training.

7 Approval

The Walker Group Modern Slavery Statement for FY20 has been approved by the boards of Walker Corporation Pty Limited ABN 95 001 176 263 and Walker Group Holdings Pty Limited ABN 91 001 215 069.

Signed for, and as director of, Walker Corporation Pty Limited and Walker Group Holdings Pty Limited:

Director

BRUCE HANCOX

Print Name

Version	Date	Summary of changes
1	31 March 2021	Initial approved document