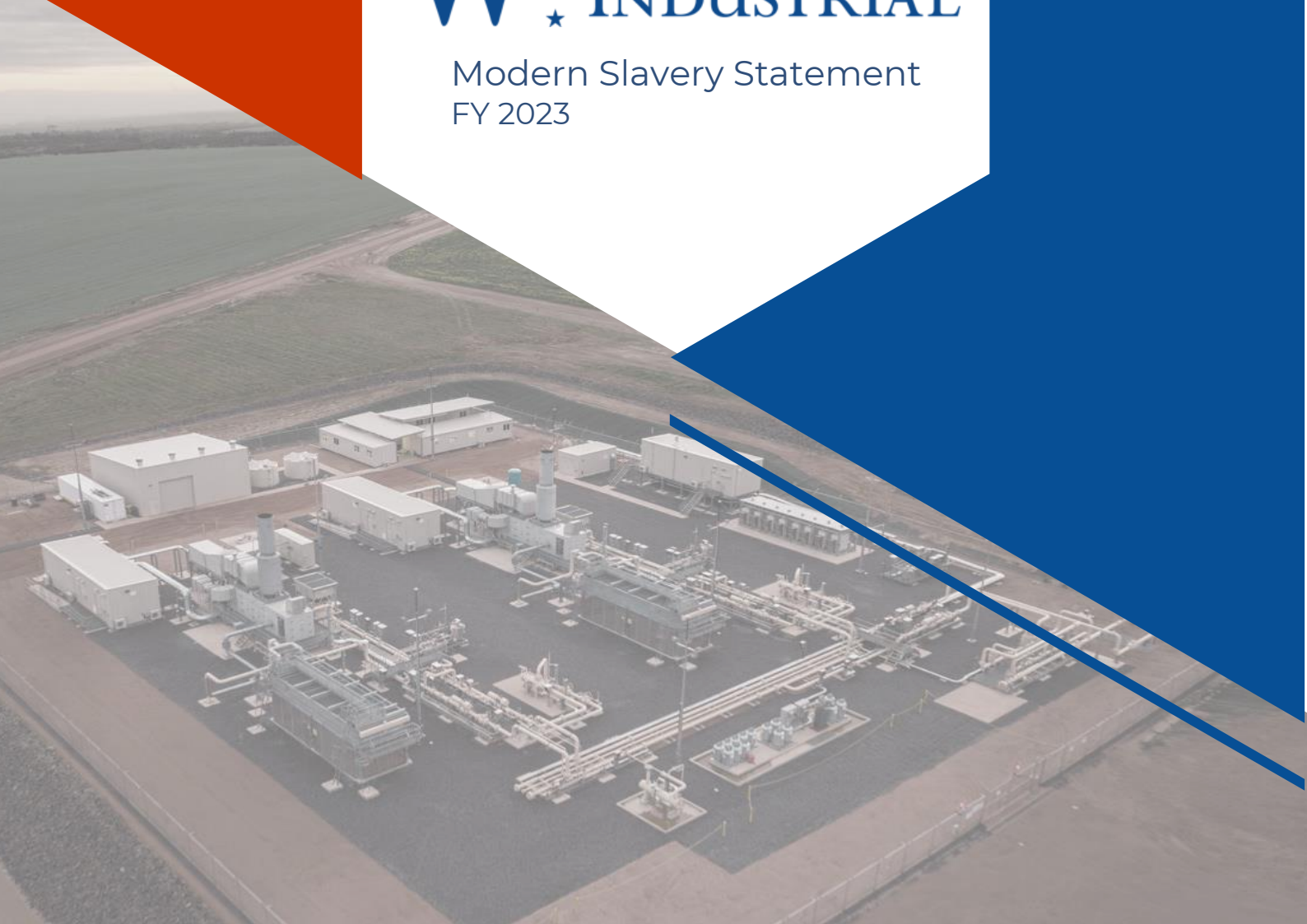




WESTSTAR INDUSTRIAL

Modern Slavery Statement
FY 2023



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REPORTING ENTITY

WestStar Industrial Limited (ACN 119 047 693) is an Australian company, publicly listed on the Australian Securities Exchange (ASX: WSI), registered at 52 Hope Valley Road Naval Base WA, 6165.

This Statement has been developed in accordance with the requirements of the Australian Modern Slavery Act 2018 (Cth). The Statement sets out the steps taken by WestStar Industrial Limited and its wholly-owned subsidiaries (referred to collectively in this statement as **'WestStar'**, the **'Group'** or the **'Company'**) to assess and prevent modern slavery and human trafficking in their Australian operations and supply chain.

The entities covered by this statement are:

- WestStar Industrial Limited (ACN 119 047 693)
- SIMPEC Pty Ltd (ACN 619 238 505)
- Alltype Engineering Pty Ltd (ACN 074 494 652)

WestStar Industrial Limited is committed to upholding the human rights of all those who work with us and for us, ensuring they can work freely and receive fair pay in return.

References in this report to 'year' or 'period' refer to the financial year ended 30 June 2023, unless otherwise stated.

ORGANISATIONAL STRUCTURE, OPERATIONS AND SUPPLY CHAINS

STRUCTURE AND OPERATIONS

WestStar Industrial Limited is an Australian company that through its wholly-owned subsidiaries, Alltype Engineering and SIMPEC, provides industrial project solutions centred around engineering, fabrication, construction and maintenance services within the resources energy, oil and gas, petrochemical, water and infrastructure sectors in Australia.

OPERATING COMPANIES



OUR SERVICES

- Construction Contracting
- Structural Mechanical Piping (SMP)
- Electrical and Instrumentation (E&I)
- Processing & Fabrication of Pipe Plate and Structural Steel
- Non-Process Infrastructure NPI
- Rotating Equipment Installation
- Asset Management Services
- Maintenance Shutdowns and Turnarounds
- Design and Construct / EPC Projects
- Multidiscipline Turnkey Projects

SUPPLY CHAINS

The WestStar Group's projects are currently exclusively in Australia, however it sources materials from its established global supply chain where it sources a diverse range of goods and services.

The top categories of supply by spend for the year ended 30 June 2023 were:

- Construction materials and consumables;
- Workforce labour hire – subcontractors;
- Transportation and freight;
- Professional engineering services;
- Travel; and
- Equipment purchase and hire.

At 30 June 2023, the Group maintained an active supplier database of over 1,400 suppliers, with the majority of its annual supplier spend occurring with suppliers and subcontractors located in Australia. The Group purchases these materials from reputable and established vendors and distributors.

OUR WORKFORCE

In our delivery of projects, WestStar has approximately 650 direct employees located in offices and sites across Australia, with the majority of our white collar workforce located in the major offices in Perth.

Our blue-collar employees are based on various sites across Australia and perform a wide variety of tasks within the fabrication, construction and maintenance services including a number of trades such as electrical, fabricating, welding and fitting.

Our office-based roles are predominantly in engineering and corporate functions such as finance and people and culture.

RISKS OF MODERN SLAVERY

OPERATIONS

WestStar acknowledges whilst the risk in the Australian workforce is low, constant pressure to maintain competitive pricing can drive modern slavery. Engagement with our subcontractors and suppliers aims to ensure that the importance of complying with WestStar's ethical requirements is understood and acknowledged by all entities. This level of compliance is also a typical requirement of our customers.

Our labour is governed by the Fair Work Act and numerous relevant Modern Awards which the Company actively audits to ensure we are compliant and, in most cases, exceed the minimum requirements as stipulated.

SUPPLY CHAINS

The diversity of products, services and places of origin by subcontractors and suppliers to WestStar, can potentially expose the Group to modern slavery risks in the supply chain, particularly at levels further down the supply chain.

We mitigate modern slavery risk through our supplier prequalification and risk assessment onboarding process. This process includes comprehensive prequalification questionnaires and checks which are reviewed and vetted by our appropriately trained personnel. After being approved, the supplier is then onboarded to our supply chain. Where a risk of modern slavery has been identified during the onboarding process, suppliers are requested to provide information concerning the risk to enable evaluation of an appropriate course of action. An unsatisfactory response from the supplier concerning modern slavery risk will prevent the supplier being onboarded. We affirm our commitment to consistently monitor, prevent, and mitigate any potential risk areas of modern slavery practices within our supply chain. This commitment underscores our dedication to ethical practices and responsible business operations.

ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISK

WestStar, through its subsidiaries, has in place a modern slavery framework articulating the Group's commitment to respecting human rights and outlining its approach to preventing, detecting and responding to the risks of modern slavery in its operations and supply chain. The modern slavery framework applies to WestStar Industrial Limited and its wholly-owned subsidiaries.

The Company's Board, along with the Directors of its wholly-owned subsidiaries, is responsible for the regular review and maintenance of the modern slavery framework, working in collaboration with operations throughout the Group.

Within WestStar's recruitment processes for directly employed staff, steps are taken to mitigate the risk of modern slavery including:

- Equal Opportunity Employment practices; including right to work.
- Adherence to Modern Awards, Enterprise Agreements and/or the Fair Work Act (2009).
- Training in Worker's Rights and Workplace grievance mechanisms.
- Training on Modern Slavery and Trafficking/The Act.

Through the Group's sourcing from local suppliers, agents and distributors, we support the same goal for overseas suppliers through stringent assessment and compliance, given the broader potential for breaches to occur. Our aim is to ensure that human rights are understood, respected and upheld across not only our Company, but across our entire supply chain.

Group certifications include:

- AS/NZS 45001 Occupational health and safety management systems.
- AS/NZS 9001 Quality management systems requirements

The Company also has a formal Whistleblower Policy in place whereby employees and others can report concerns freely and without fear of repercussion. WestStar acknowledges that whistleblowers play an important role to identify and call out misconduct and breaches of the law and policies. The policy offers whistleblower protections to encourage and enable them to come forward to report any concerns or misconduct, including breaches of modern slavery, without fear of retribution or personal detriment.

ASSESSING EFFECTIVENESS

The Group’s processes are governed by our internal business management system, which is subject to regular internal audits to ensure compliance with the systems and maintenance of accreditations.

WestStar’s prequalification process ensures before any subcontractors are engaged, that the company complies with the Modern Slavery Act. If the company does not comply, WestStar will terminate any discussions relating to utilising the company and source a compliant alternative.

WestStar implements effective due diligence procedures and other controls to ensure modern slavery is not taking place anywhere in our own business or in our supply chains and communicating our expectation of the same high standards from all of our contractors, suppliers and other business partners, that they will hold their own suppliers to the same high standards.

CONSULTATION PROCESS

This Statement has been prepared by the Board of WestStar Industrial Limited of which, drives the overall governance of the Group, including modern slavery risk in conjunction with the executives of each wholly-owned subsidiary (detailed in section titled “Organisational Structure, Operations, and Supply Chains”) who oversee the actions taken to address those risks in our operations and supply chain.

This Statement for the financial year 2023 is published pursuant to section 14 of the Modern Slavery Act 2018 (Cth) and was developed in consultation with each operational subsidiary.

APPROVAL

Approved by the Board of Directors of WestStar Industrial Limited.



Robert Spadanuda
 Managing Director
 12 March 2024

APPENDIX A

This statement was prepared to meet the mandatory reporting criteria set out in the Modern Slavery Act 2018 (Cth).

The table below identifies where each criterion is disclosed within the different sections of the statement.

Modern Slavery Act 2018 (Cth) Criteria	WestStar Modern Slavery Statement FY23
Identify the reporting entity	Reporting Entity section (Page 3)
Describe the reporting entity's structure, operations and supply chain	Organisational Structure, Operations and Supply Chains (Pages 3-4)
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or control	Risks of Modern Slavery (Pages 4-5)
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Actions taken to assess and address Modern Slavery risk (Pages 5-6)
Describe how the reporting entity assesses the effectiveness of these actions	Assessing effectiveness (Page 6)
Describe the process of consultation with entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Consultation process (Page 6)
Provide any other relevant information	N/A



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