

2024

MODERN SLAVERY STATEMENT

William Adams



INTRODUCTION

This Modern Slavery Statement (Statement) is made in accordance with the Modern Slavery Act 2018 (Cth) (the Act). This is William Adams Pty Ltd's (William Adams) fifth Modern Slavery Statement.

William Adams recognises that modern slavery is a complex issue that can manifest in a variety of ways in the operations and supply chains of businesses. Modern slavery affects workers, individuals and communities globally on an enormous scale. We are determined to work collaboratively with our suppliers and other stakeholders to play our part in ending modern slavery.

Modern slavery rarely occurs in isolation and can form part of more complex issues, including wider discrimination and exploitation of workers. Examples of modern slavery include slavery, servitude, child labour, forced labour, human trafficking, debt bondage, slavery like practices, forced marriage and deceptive recruiting for labour or services.

William Adams remains committed to acting responsibly and with high ethical standards. We have sought to integrate high ethical standards within our corporate culture and continue to stay conscious of issues surrounding modern slavery practices. We are guided by our company values, that unite our employees and help foster a culture of moral and ethical vigilance.

William Adams' values are:

01

INTEGRITY

Integrity is the foundation of all we do. It is a constant. Those with whom we work, live and serve can rely on us. We do not improperly influence others or let them improperly influence us. We are respectful and behave in an open and honest manner.

EXCELLENCE

We are passionate about people, process, product and service excellence. We are determined to serve our customers through innovation, continuous improvement, an intense focus on customer needs. For us, Excellence is not only a value; it is a discipline and a means for making the world a better place.

TEAMWORK

We are a team, sharing our unique talents to help those with whom we work, live and serve. The diverse thinking and decision making of our people strengthens our team. We respect and value people with different opinions, experiences and backgrounds. We know that by working together, we can produce better results than any of us can achieve alone.

COMMITMENT

Individually and collectively we make meaningful commitments –to each other, and to those with whom we work, live and serve. We understand and focus on the needs of our customers. We are responsible members of our communities who are dedicated to safety, care for our environment and manage our business ethically.

SUSTAINABILITY

We are committed to building a better world. Sustainability is part of who we are and what we do every single day. We recognise progress involves a balance of environmental stewardship, social responsibility and economic growth. We work toward a vision of a world in which people's basic needs - such as shelter, clean water, education and reliable energy - are fulfilled.

We have and continue to develop processes and procedures to identify and remedy instances of modern slavery and recognise that enormous work is needed, globally, to address these issues.

This Modern Slavery Statement describes the structure, operations and supply chains of William Adams, and the risks of modern slavery in those operations and supply chains during the period 1 July 2023 to 30 June 2024 (Reporting Period). It also details the actions taken by William Adams to minimise the identified risks and the effectiveness of those actions.



02

REPORTING ENTITY

This Modern Slavery Statement has been prepared in accordance with the Act.

The reporting entity covered by this modern slavery statement is **William Adams Pty Ltd** ABN 72 009 569 493.

William Adams is an Australian proprietary company with its registered office in Burnie, Tasmania.



03

STRUCTURE, OPERATIONS AND SUPPLY CHAIN OF WILLIAM ADAMS

STRUCTURE

William Adams is the Caterpillar heavy machinery dealer for Victoria and Tasmania. Headquartered in Clayton, Victoria, William Adams supplies Caterpillar products and services to the construction, mining, quarrying, on-highway trucks and marine industries.

William Adams has branches in 14 locations throughout Victoria and Tasmania. William Adams employs approximately 670 people and trades as William Adams CAT, the Cat Rental Store and Head Hunters.

OPERATIONS

William Adams' operations include:

- Sales and service of new and used Caterpillar products;
- Rental of Caterpillar and related products through the Cat Rental Store;
- Sales of new, used and remanufactured parts;
- Condition monitoring services and other technology solutions; and
- Engine repair and reconditioning through Head Hunters & Development.

Our operations are supported by the following functions:

- Finance and credit;
- Legal and risk management;
- Human resources;
- Information services; and
- Marketing.





Map 1. Victorian Branches

Map 2. Tasmanian Branches

SUPPLY CHAIN

As the long-standing Caterpillar dealer for Victoria and Tasmania, William Adams' supply chain continues to remain stable and it is largely based on long term relationships, with the major supplier being Caterpillar and Caterpillar related entities.

Beyond Caterpillar, William Adams' supply chain is comprised of approximately 1643 active suppliers, that can be broadly split into two categories:

- **Trade based suppliers:**
Suppliers that provide goods and services to William Adams that William Adams will resell to customers or incorporate into other goods for resale. Caterpillar is the most prominent trade-based supplier to William Adams, and others include suppliers of aftermarket parts, accessories and attachments, oils and lubricants.
- **Non-trade suppliers:**
Suppliers that provide goods and services to support William Adams' operations and/or goods that are not intended for sale to customers. These include transport and logistics, cleaning services, waste disposal and uniform and safety supplies.

There has been little change in the William Adams supply chain during the Reporting Period and it continues to remain. The supply chain remains complex and diverse, encompassing businesses ranging from small family operated businesses through to global corporations.

MODERN SLAVERY RISK PROFILE

At a high level, William Adams acknowledges that there are risks that modern slavery practices may occur within its supply chains and operations that may lead to William Adams causing, contributing to, or being directly linked to modern slavery. We discuss each of these elements below.

However, William Adams considers the risk that it is responsible for directly causing modern slavery is very low.

We have a range of internal control and governance measures designed to foster (and monitor) ethical business conduct in everything we do.

Also, through our culture of continuous improvement, we continue adding to these existing measures to mature our understanding of modern slavery and further strengthen our framework for identifying, assessing and addressing modern slavery risk within our operation and supply chain. Internal personnel risk is largely managed by our professional and thorough recruitment and training practices. William Adams predominantly engages its employees on permanent employment contracts and has policies, procedures and resources to ensure compliance with relevant laws, including with respect to employee pay and entitlements. Furthermore, our existing policies and procedures are frequently reviewed and updated to better reflect our updated approach on these issues.

Other policies contributing to the ethical treatment of our personnel and other people in our operations include our:

- Code of Conduct;
- Equal Opportunity, Anti-Discrimination, Harassment & Bullying Policy; and
- Anti-bribery and Corruption Policy.

William Adams also has a Whistleblower Policy with anonymous reporting available to employees to raise any concerns regarding modern slavery (as well as other illegal, unethical, fraudulent or undesirable conduct).

In addition, all employees have access to an independent employee assistance program.

104

There is some risk within William Adams' supply chain that it may contribute to modern slavery, however we consider that the risk is very low. William Adams always aims to treat its suppliers ethically and would never knowingly act in a way (such as through the exertion of commercial pressure or the imposition of contractual terms and conditions) that directly or indirectly incentivises a supplier to engage in modern slavery practices.

William Adams recognises that there is also a risk that it may be directly linked to modern slavery practices as a consequence of its suppliers, or suppliers to its suppliers, engaging in modern slavery activities without William Adams' knowledge. We are aware that modern slavery risks may differ throughout the various links in our supply chain and may be heightened in some sectors and locations.

As part of its ongoing commitment and effort to better understand its supply chain risks, William Adams has undertaken another yearly assessment of its most significant suppliers. The review process has allowed us to continue to update our supplier lists to optimise the risk analysis that we perform.

William Adams will continue to build on the process of engagement with suppliers, especially those identified as high or medium risk to investigate areas of improvement and/or potential alternatives.

William Adams will continue to build on the process of engagement with suppliers, especially those identified as high or medium risk, to investigate areas of improvement and/or potential alternatives.



05

ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

During the Reporting Period, William Adams has maintained a proactive and multi-faceted approach to Modern Slavery mitigation and prevention. It has taken numerous actions to assess and address the risks of modern slavery within its operations and supply chains. Broadly, the following are some of the areas we have focused on during this Reporting Period:

- Maintaining awareness about modern slavery within our business, the business of our suppliers and our partners as well as their suppliers;
- Educating staff and employees through the provision of training; and,
- Adopting robust measures to improve existing practices and further evolve over time through a culture of continuous improvement and deployment of new information and training tools as they have become available.

In addition, William Adams' modern slavery compliance team, which is responsible for engaging with the broader business to assess and address modern slavery issues, has continued to remain active during the Reporting Period and has met on a regular basis to discuss modern slavery issues and raise general awareness within the wider business.

Some of the actions and outcomes that William Adams has undertaken during the Reporting Period are outlined below:

ASSESSMENT OF RISKS

- Engaging with senior management to ensure appropriate oversight for compliance with the Act and in assessing modern slavery risks more generally. Updating the register of William Adams' suppliers to record risks of modern slavery within the supply chain that were identified during the previous reporting period.
- Continual audit and revision of suppliers to identify relevant risks.

- Ongoing monitoring and risk assessment through the completion of another supplier questionnaire with existing suppliers and updating William Adams' preferred supplier list.
- Ongoing review of William Adams' existing procurement processes and procedures, notably around sourcing, selecting and onboarding of new suppliers to better assess and identify modern slavery risk and ensure we are engaging the right suppliers.

ADDRESSING AND MITIGATING THE RISKS OF MODERN SLAVERY

- Finalising the development and implementation of William Adams' Procurement Policy and rolling it out to the wider business.
- Continuously monitoring compliance with the William Adams Modern Slavery Policy and Supplier Code of Conduct, by William Adams and its suppliers to mitigate risks of modern slavery being present in our operations and supply chain. Ongoing provision of modern slavery training to employees and staff to educate and raise general awareness;
- Continuing the requirements for suppliers to assess and address modern slavery risks in their own supply chains, including the requirement to permit William Adams to audit suppliers and to terminate agreements for non-compliance with modern slavery obligations.
- Undertaking a further review of William Adams' general terms and conditions and standard template agreements with customers and suppliers and making necessary changes to give further consideration to William Adams' various legal and regulatory obligations, including modern slavery laws.
- Maintaining William Adams' internal document portal as a repository system used to better keep track of updated supplier and customer agreements and documentation as part of the broader compliance framework.
- Updating our website to ensure transparency in modern slavery prevention initiatives.
- Ongoing Company-wide communications to increase awareness amongst our entire workforce of the prevalence and risks of modern slavery, and what actions can be taken to minimise those risks.

As modern slavery issues are so complex and wide ranging, it is difficult to measure the effectiveness of single actions. We are pleased with the overall increased awareness of modern slavery issues across the whole business and strengthening of our assessment framework to mitigate and prevent the modern slavery risks within our supply chain.

In assessing the effectiveness of the actions we have taken in this and previous Reporting Periods to assess and address modern slavery risks, we report the following outcomes:

- The work we have undertaken around the assessment and continuous monitoring of our suppliers has given us a greater understanding of the participants in our supply chain which will allow us to further address these issues in future reporting periods;
- The process involving the drafting and implementation of William Adams' Procurement Policy has been a valuable exercise for William Adams as it required consultation with key stakeholders across different business groups and consideration of various issues surrounding the engagement of suppliers, including on modern slavery issues. This has in turn helped set clearer expectations internally about the process for engaging the right suppliers, including encouraging staff to use the preferred supplier's list and avoid cross-overs when engaging one-off purchases.
- Further review and updating of William Adams's standard template agreements and general terms and conditions has also proven to be a positive outcome as they now succinctly set out legal obligations of customers and suppliers in respect of modern slavery.
- The William Adams' document portal, as a central repository system used for storage of documents and contracts, has become a valuable tool in monitoring and tracking suppliers' compliance with modern slavery requirements, both during the initial onboarding stage as well as during yearly reviews;
- We continue to increase our understanding of the prevalence of modern slavery and the actions we can take to minimise the risks;
- Our suppliers are contractually obliged to investigate, assess and address modern slavery risks within their operations and supply chains and those obligations are becoming more accepted and widely understood; and
- In our capacity as a supplier, we readily agree to comply with modern slavery minimisation and reporting requirements of our customers and we actively participate with our customers' questionnaires designed to ensure our own compliance with modern slavery laws.



ASSESSING THE EFFECTIVENESS OF ACTIONS

06

07

PROCESS OF CONSULTATION

William Adams does not own or control any operating entities that require consultation in relation to modern slavery risks under the Act. William Adams continues to engage in discussions with other businesses to better understand and share experiences in assessing and addressing modern slavery within the respective organisations.

This statement, and the work undertaken in addressing modern slavery risks, has been prepared and undertaken with input from relevant areas of the William Adams organisation, including procurement, finance, legal and senior management.





08

LOOKING FORWARD

William Adams remains committed to continuous improvement of its procurement processes and identifying and minimising modern slavery within its operations and supply chain.

It is our aim to undertake ongoing monitoring of modern slavery risks and continue to identify areas for improvement. To achieve this we will continue to engage with our suppliers to understand the risk profile in relation to modern slavery and mitigate those risks where possible.

William Adams will widen the scope of its supplier risk analysis process in the future, with a view to maintaining a high level of engagement with suppliers identified as high or medium risk and to investigate areas of improvement or, if that is not possible, seek potential alternatives. More particularly, we intend to further enhance our procurement processes and procedures through carrying out a review of the newly established Procurement Policy to identify any gaps and areas of improvement including, in particular, around modern slavery mitigation strategy and prevention framework when sourcing, selecting, and onboarding new suppliers.

In addition, William Adams is committed to maintaining awareness through developing and expanding the education and training of our staff and employees. This includes giving more focus to education around modern slavery to new employees during the initial onboarding and training stage. We will continue to improve and add to our education and training as new information and training tools become available. We believe raising awareness and continuing the conversation this way will help staff and management team develop greater capability in identifying modern slavery risk and in turn, enhance William Adams's overall effectiveness in addressing and preventing modern Slavery practices.

APPROVAL OF MODERN SLAVERY STATEMENT

This statement was approved by the board
of directors of William Adams Pty Ltd on
19 December 2024.

Adam Elphinstone
Managing Director



APPENDIX

This Modern Slavery Statement was prepared to address the mandatory criteria and to ensure compliance with the Modern Slavery Act 2018.

The table sets out where each mandatory criterion is addressed within the statement.

William Adams



MANDATORY CRITERIA		PAGE
01	Identify reporting entity.	3
02	The structure, operations and supply chains of the reporting entity.	4
03	The risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	6
04	The actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks.	8
05	How the reporting entity assesses the effectiveness of such actions.	9
06	The process of consultation with any entities the reporting entity owns or controls or is issuing a joint modern slavery statement with.	10
07	Any other information that the reporting entity, or the entity giving the statement, considers relevant.	2 & 11