

## Modern Slavery Statement 1 July 2022 – 30 June 2023

- Modern Slavery
- Human Rights
- Ethical Sourcing
- Employment Conditions

### Reporting Entity & Introduction

This is a statement for the entity 'The Trustee for THE KJ WALLACE DISCRETIONARY TRUST (Known as 'ETS Infrastructure Management Pty Ltd', 'Falbury Pty Ltd' and 'ETS').

ETS is subject to the Modern Slavery Act 2018 that commenced operation on 1 January 2019 and this statement is pursuant to the Act and a position that ETS holds to end modern slavery worldwide.

#### **ETS is committed to:**

- *The detection, exposure, and remediation of Modern Slavery*
- *Ending modern slavery, human trafficking, slavery, debt bondage, forced labour, child labour and slavery-like practices*
- *Upholding human rights to end human rights abuse*
- *Ethical, sustainable, and socially responsible sourcing*
- *Eliminating fraud and corruption*
- *Fair employment conditions*
- *Abolishing anti-harassment, discrimination, and bullying*

ETS is committed to conducting its business legally, responsibly, and ethically and to ensuring that all aspects of our business practices, including our supply chains, are free from any form of slavery.

ETS does not partake in any form of modern slavery within its operations including: forced labour, child labour, gender inequality, unfair trade practices or slavery of any kind.

ETS is committed to implementing effective systems and controls to ensure that it does not occur within our own business or through any of our supply chains or business partners.

ETS policies expect a culture of high ethical standards including compliance with applicable laws, contractual and other obligations.

### **ETS VALUES**

**Stand Tall** – Doing the right thing always, acting with honesty & integrity and being proud of what we do

**Grow Strong** – Always improving on what we do, but never forgetting our roots.

**Canopy of Trust** – Working together, supporting, and encouraging each other, and being accountable for our actions

**Branch Out** – Seeking opportunities, embracing change and delivering on our promises.

*...working safely*

## Structure, Operations and Supply Chain

ETS is one of Australia's leading infrastructure management companies in Australia. It is a privately owned company, which commenced operations in Victoria in 1981 as a specialist power line tree clearing service. In July 1999, operations expanded to Queensland followed by Tasmania in 2006, New South Wales and Western Australia in 2009. The business has grown significantly over the last few years and currently employs more than 1000 personnel nationally.

ETS service offering has diversified over the years, whilst remaining true to its foundations. ETS operates across multiple sectors including vegetation management, electrical and water metering services, and fleet hire. Since 1981, ETS has focused on delivering effective, efficient, and sustainable vegetation management to power companies, local, state and Federal Government, National Parks, large developers, property managers and private property owners.

ETS has offices throughout metropolitan and regional Australia with its head office located in Lilydale, Victoria.



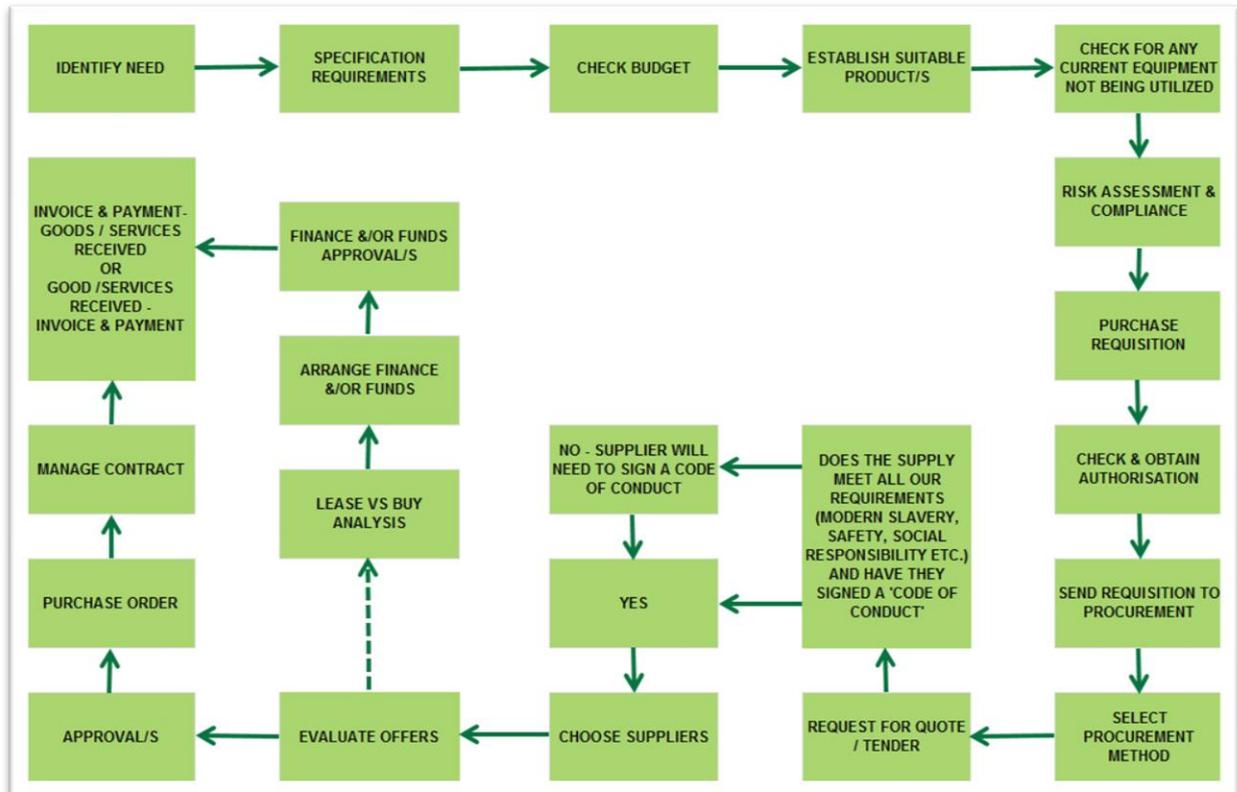
## SUPPLY CHAIN

As a service-based organisation, compliant with all laws and regulations, there is relatively low risk of modern slavery occurring within our supply chain and operations. ETS recognise that indirect exposure to modern slavery and human trafficking through our supply chains is a possibility. ETS does not use high risk supply chains, which are susceptible to modern slavery risks.

*...working safely*

ETS understand their responsibility to conduct our business ethically and this extends to our supply chain. It is a condition of all ETS suppliers and their employees, subcontractors that the principles set out in the ETS Modern Slavery Supplier Code of Conduct are adhered to. ETS continually assesses the risk of modern slavery taking place throughout its supply chains and operations.

## SUPPLY CHAIN PROCESS



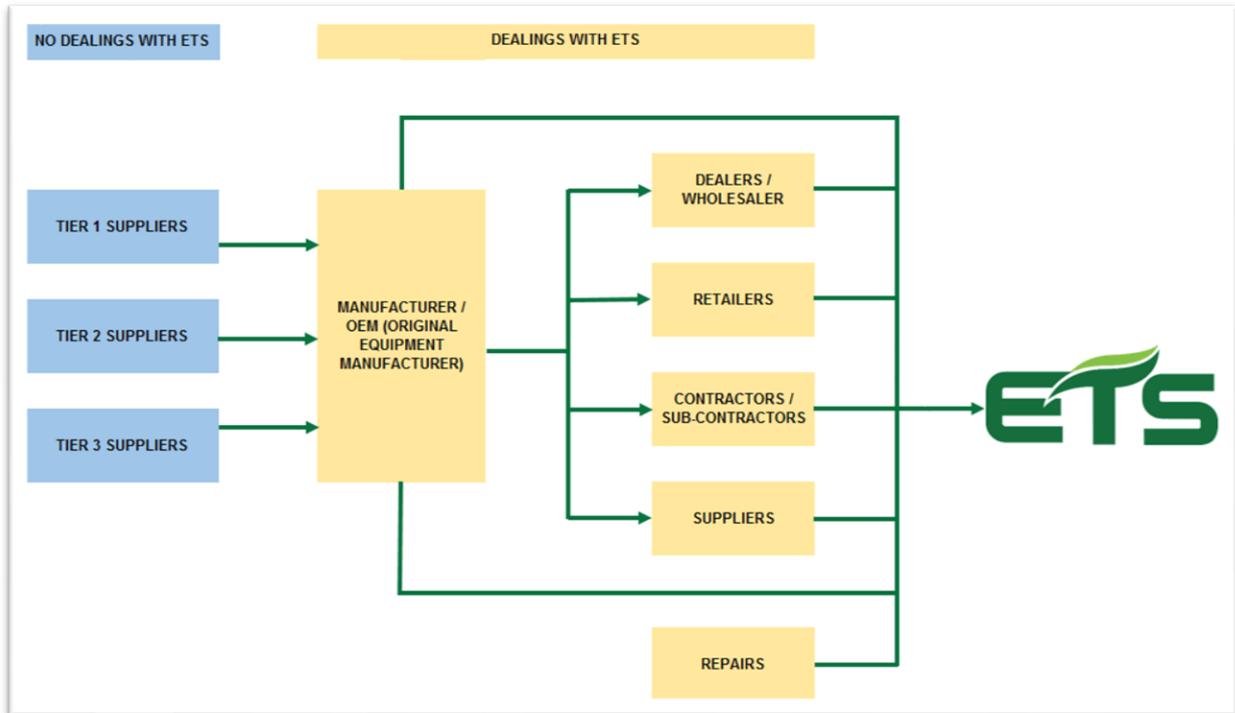
### ETS will

- Purchase, where possible, from Australian based suppliers
- Conducting due diligence on third party service providers; and
- Partnering with suppliers who share our stance on modern slavery.

ETS are committed to undertaking our due diligence processes when contracting with external suppliers and to identifying and assessing any indications of suppliers being of high risk.

We will not engage with high-risk suppliers unless we have conducted the appropriate assessment that our standards will not be compromised.

## SUPPLY CHAIN MAPPING



### Assessing and addressing Modern Slavery Risk

#### **Steps taken to mitigate Modern Slavery risk.**

A risk-based approach will be used in identifying suppliers who will be asked to agree to a Supplier Code of Conduct and answer the Supplier Self-Assessment Questionnaire.

Answers to this questionnaire will provide a greater understanding of the risk of modern slavery within a supplier's supply chains or operations and enable us to work with a supplier to reduce the known or perceived risks identified. We will actively and progressively improve our understanding and oversight of all tiers of our supply chains. Purchases will only be made from suppliers where there is no suspicion of modern slavery practices as determined by answers to the questionnaire.

ETS has a central procurement function, and uses third parties to support high quality, effective and efficient delivery of our services. ETS intends to factor modern slavery due diligence into major future procurement decisions.

#### **Assessing the effectiveness of these actions**

ETS are committed to undertaking our due diligence processes when contracting with external suppliers and to identifying and assessing any indications of suppliers being high risk.

ETS engages with our supply chains and identifies industry best practice.

We monitor the compliance of all personnel signing off on the ETS Handbook Acknowledgement form, whereby acknowledging their commitment to adhering to ETS Modern Slavery Policy.

*...working safely*

### **What action will be taken if Modern Slavery practices are suspected?**

A key part of supporting ethical standards is enabling ETS, suppliers or clients to feel free and safe to speak up when there are reasonable grounds to suspect ETS or their suppliers are not acting in accordance with laws and regulations. ETS employees will be directed to report any suspicions of modern slavery to their manager, HR Department or directly to the Australian Federal Police and/or Anti-Slavery Australia.

Concerns about compliance, unethical activities or illegal issues are to be reported and responded to in accordance with Whistleblower Policy as outlined in the ETS Handbook given to all employees and subcontractors as part of their company induction. ETS will be careful not to put the victim or survivor of modern slavery in danger, and not disclose any personal information without informed consent.

If we become aware of, or suspect someone has been trafficked, this will be reported to the Australian Federal Police on **131 237**. There is a **Human Trafficking, Sexual Servitude and Slavery Information Report Form** on the Australian Federal Police website. Contact with the AFP can be anonymous.

Where there is an emergency, or if a child is concerned, dial 000.

For assistance and help you can contact **Anti-Slavery Australia** on 02 9514 8115.

## **ETS PEOPLE**

### **Workforce, recruitment, and labour hire**

***The ETS does not engage in or support the following:***

- Any forced labour (exception being working within the Justice system)
- Child Labour as defined in the Modern Slavery Act 2018 Australia
- Holding workers and/or employees identity papers as security
- Request or insist that workers and/or employees providing money deposits as security
- Slavery, bonded, or indentured labour.
- The arms trade.
- Any unfair trade practices.
- Pornography
- We value and observe all laws regarding corporate social responsibility, environmental and workplace safety protection and staff inclusion and diversity.
- We are committed to training our employees and ensuring they have a healthy understanding and respect for how their choices can have far-reaching impacts upon basic human rights across the globe.

### PROGRESS 2022-2023

ETS did not become aware of any suspicion or actual reports of any incidences of Modern Slavery from any of our suppliers or operations in the 2022-2023 period.

ETS assessment of supply chains and processes to mitigate the risk or perceived risk of Modern Slavery remain ongoing. To date, we continue to ensure that the minimum standards of the Modern Slavery Code of Conduct are met or exceeded by our suppliers. We continue to request suppliers provide us with their Modern Slavery Statements (if available), and to completing a Supplier Self-Assessment Questionnaire.

ETS adheres to the requests of our clients by providing evidence of our own adherence to Modern Slavery ACT and actions we are taking.

ETS employees and subcontractors are issued with a copy of the ETS handbook on the commencement of their employment. The Handbook provides an overview to the Modern Slavery policy, and as part of the induction process, all employees and contractors sign the Handbook Acknowledgement form, agreeing to the terms and conditions, of which the Modern Slavery Policy and Supplier Code of Conduct form part of.

### CONCLUSION

ETS is committed to operating our business lawfully and ethically and only engaging with suppliers that align to our values. We expect our suppliers to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking, and child labour.

We will work proactively to identify and evaluate risks relating to Modern Slavery, continually developing our policies, procedures, and training to help combat these and other injustices of Modern Slavery and Human Rights.

### APPROVAL

This statement was approved by Kevin John Wallace as sole director of Falbury Pty Ltd.

Name: Kevin John Wallace

Title: Director

Date: 08/02/2024

Signed:

