



# WALKER GROUP MODERN SLAVERY STATEMENT For the 2021 Financial Year

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Walker Corporation supports 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 2021, 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 second 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 14 of the Act;
- explains the actions Walker has taken and is taking to assess and address modern slavery risks in its operations and supply chains during the financial year ending 30 June 2022; and
- has been approved by the Boards 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 company, 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 procurement and the engagement of services to assist with head office operations, and administering Walker's business.

As at 30 June 2021, Walker's direct workforce comprised over 600 employees across 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 third parties such as suppliers, advisors and consultants in connection with the development of its assets, and large capital expenditure projects. These third parties 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 masterplanned 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 has implemented an ongoing process of identifying and assessing risk in its operations and supply chains, and has consulted 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

Health and safety are a high-level risk across Walker's operations, and we have implemented and continue to adhere to a Workplace Health & Safety Policy to address this risk 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 an ongoing due diligence process in respect of proposed new suppliers, and by seeking strengthened provisions in supplier contracts to address modern slavery risks.

### 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

During the relevant reporting period, 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 FY23 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 refined its 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 rigorous contractual compliance requirements with respect modern slavery risks within tender evaluations for high-risk supply chains.

- **Contracts and template clauses**

Walker has tightened its requirements for modern slavery contractual conditions in supplier contracts within high risk supply chains.

Additionally, supplier contracts have been 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 revised a number of internal policies to further support its commitment to responsible work practices, such as the Modern Slavery Policy, Workplace Health & Safety Policy.

- **Grievance processes**

Walker has established a whistleblower policy to 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.

## 6 Measuring effectiveness

We will continue to monitor and 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 refinement of existing policies and the finalisation of further policies, and employee training.

## 7 Approval

The Walker Group Modern Slavery Statement for FY21 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 a director of Walker Corporation Pty Limited and Walker Group Holdings Pty Limited:



Director

BRUCE HANCOX

Print name