



# Modern Slavery Statement



WorkPac Pty Ltd

Year Ended 30 June 2022



---

# Table of Contents

- 1. About the Reporting Entity .....2
- 2. Structure and Operations .....3
- 3. Operational Risk.....3
- 4. Supply Chain Risk .....4
- 5. Analysis and Continuous Improvement .....5
- 6. Consultation .....6
- 7. Endorsement.....6

## I. About the Reporting Entity

This joint statement is prepared by WorkPac Group Pty Ltd (ACN 633 333 060), under clause 14 of the *Modern Slavery Act 2018* and sets out the acts to address modern slavery risks for WorkPac Group Pty Ltd and its subsidiaries WorkPac Pty Ltd and WorkPac Mining Pty Ltd which are reporting entities under the Act. The WorkPac Group comprises the reporting entities and all other subsidiaries within the group owned by WorkPac Group Pty Ltd. The WorkPac Group is a privately owned Australian group and leading provider of recruitment and contract labour services within Australia, with a total of more than 8,000 employees at any given time. The registered office of the reporting entities is: c/- The Peak Partnership, Level 1, 17 – 19 Mount Gravatt Capalaba Road, Upper Mount Gravatt QLD 4122.

The WorkPac Group comprises:

- Employing and operational entities for specific industries (e.g. health and social care);
- A Registered Training Organisation (RTO);
- An employment services business;
- An engineering and construction business (being discontinued); and
- Other functional entities.

Further details of all companies in the WorkPac Group are outlined in the WorkPac Group's Annual Report – 30 June 2022.

Over its 25-year history, the strong growth of the business is attributable to several key values, one of which is a commitment to respecting and valuing people – a cornerstone of the WorkPac Group's "Who We Are and Our Aspirations" policy. As part of this commitment, the WorkPac Group acknowledges that modern slavery exists within Australia and globally and seeks to minimise potential or actual modern slavery within its own operations and supply chain. As well as achieving effective mitigation of these risks, this is also important to upholding the good standing and reputation of the WorkPac Group and its clients.

Building upon this, the WorkPac Group has implemented a "Modern Day Slavery Policy", clearly stating a commitment to minimising the potential for modern slavery to occur within its own operations and that of its supply chain. In particular, the policy is communicated to the WorkPac Group's direct suppliers, with the explicit expectation that its principles are upheld within their own operations and with respect to their own supply chains. The policy, and evidence of the WorkPac Group's associated actions, also give clients confidence that appropriate and meaningful action is being taken by the WorkPac Group as they review their own supply chains.

As a business with consolidated revenues exceeding \$1.17 billion in the financial year ended 30 June 2022, the WorkPac Group is obligated to prepare and submit this statement in accordance with the requirements of the *Modern Slavery Act 2018* (Cth). This statement outlines the WorkPac Group's actions to ensure that there is no modern slavery within its own operations, how its supply chain is analysed and managed, and the WorkPac Group's vision for continuous improvement in the management of modern slavery risks.

## 2. Structure and Operations

The WorkPac Group is a national business with local teams operating in over 35 locations around mainland Australia. These cover metropolitan, regional and remote areas that are of significance to our customers: clients who require labour services and candidates who are seeking employment. Both recruitment and contract labour services are provided whereby:

- Recruitment entails the identification and presentation of candidates to clients, who will select and employ the successful applicants directly; and
- Contract labour services refers to an arrangement where the WorkPac Group is the employer of field team members (FTMs) who are placed under the supervision and direction of host clients for their needs whether for temporary assignments, project work, or ongoing roles.

The WorkPac Group's clients span many industries, including: mining, civil, construction, healthcare, social care, manufacturing, distribution, and defence.

As noted above, the broader WorkPac Group also comprises several other related operations, which are predominantly:

- Training services including nationally accredited qualifications;
- Diversity and inclusion services, particularly for Indigenous Australians;
- Community engagement and charitable endeavours;
- Employment services; and
- Engineering and construction services as part of a diversified business model (being discontinued).

The WorkPac Group is proud to be a key contributor to Australian employment through:

- Connecting job seekers with employment, with more than 26,000 successful placements in a typical year;
- Facilitating meaningful career progression, with thousands of the WorkPac Group's employees transitioning to direct employment with their respective clients each year;
- Driving lasting change towards closing the gap when it comes to employment, with a national Indigenous participation rate of 7% (more than double the population rate);
- Supporting gender equality and opportunities for women, for example with above average female participation rates in the mining industry; and
- Fostering skills and career development for many Australians, including over 1,000 successfully completed apprenticeships and traineeships in the last five years.

## 3. Operational Risk

Over 90% of the WorkPac Group's expenditure for the financial year was in the payment of wages and other entitlements to its employees, both for its FTM workforce and its own internal staff. This incorporated an average FTM workforce of 8,000 employees at any given time, and up to 500 internal staff. The average wages of FTMs exceeds \$140,000. The WorkPac Group is confident that the risk of modern slavery within its own operations is very low as:

- Best practice systems, policies and procedures are employed for the recruitment and employment of people within the WorkPac Group's operations;
- Regular audit and monitoring from both internal and external experts demonstrates that these systems, policies and procedures are being followed without exception;
- Ongoing compliance with legal obligations is maintained, providing working conditions and entitlements which are well above standards that would constitute modern slavery;
- The WorkPac Group is committed to ensuring that workplaces are suitable and safe, with regular audits conducted on every workplace where employees are required to work;
- Regular contact is made with FTMs through direct contact and anonymous surveys to provide regular opportunities to raise any concerns or issues; and
- In accordance with the WorkPac Group's values and policies, all of its employees are required to be treated with respect, fairness and integrity.

Corporate governance and leadership from the WorkPac Group's Board of Directors is responsible for ensuring that these systems are in place, and are operating in accordance with policies, procedures, and referenced industry standards. This includes an in-depth auditing regime which combines internal and external auditing at individual locations and at a company-wide level. Several management committee meetings are also conducted at frequent intervals to strengthen the monitoring and review of the WorkPac Group's systems by the Executive and Board of Directors.

The WorkPac Group undertakes proactive risk management of its workforce including ensuring compliance with all Awards and Enterprise Agreements, checking work rights and qualifications of employees. All employees have access to a whistle-blower hotline and Employee Assistance Program (EAP) should they have any concerns about their safety or our workplaces.

## 4. Supply Chain Risk

Key supply categories are managed by the WorkPac Group's national procurement team. The primary products and services sourced by value are: PPE, medicals, air travel, accommodation, ICT equipment. The WorkPac Group's Modern Day Slavery Policy is communicated to suppliers, setting clear expectations as to the standards expected of suppliers. These include:

- Suppliers must not use forced, bonded or involuntary labour;
- Child exploitation is prohibited;
- Rights to freedom of association and collective bargaining are to be respected;
- Working conditions are to be safe and hygienic;
- Fair wages and benefits are paid, and working hours are not excessive; and
- Discrimination, bribery, corruption, harsh and inhumane treatment are all prohibited.

The WorkPac Group's procurement procedures include the careful evaluation and selection of suppliers based on several key criteria, including the management of modern slavery risks. Each potential supplier is questioned on their own policies and procedures for the management of modern slavery risks, with responses reviewed and stored by the procurement team. In addition, regular review of existing suppliers is also conducted to ensure the currency of information held by the WorkPac Group, and to assess any continuous improvement initiatives of the supplier. All suppliers are required to comply with modern slavery requirements.

Each of the WorkPac Group's suppliers are assessed for their modern slavery risk, based upon information provided by the supplier and publicly available risk data, including:

- Responses received from suppliers regarding their commitment to the WorkPac Group's Modern Day Slavery Policy, and details of their own procedures for identifying and managing modern slavery risks;
- The potential level of risk associated with the sector or industry of each supplier;
- The potential level of geographical risk associated with the location of the supplier, or the countries which inputs are sourced; and
- The potential level of risk associated with the particular products and services provided by the supplier.

Whilst it is not feasible to conduct thorough analysis of the WorkPac Group's entire supply chain, the above risk assessment enables the identification of priority areas to target further investigation where warranted.

## 5. Analysis and Continuous Improvement

The WorkPac Group continues to evolve its management of modern slavery risks. A solid foundation has been laid through:

- The implementation of a Modern Day Slavery Policy, setting internal standards and outlining clear expectations of the WorkPac Group's suppliers;
- Review of the WorkPac Group's operations and supply chain, including engagement with direct suppliers to understand their modern slavery risks and actions;
- Training of key personnel regarding modern slavery and the management of modern slavery risks; and
- Reporting of management practices and risks in relation to modern slavery.

The operation and effectiveness of the WorkPac Group's modern slavery management practices are reviewed on a regular basis by representatives from the Board of Directors, Executive and management team.

Reflecting upon best practice and community examples in the management of modern slavery, the WorkPac Group recognises that it can continue to improve in the monitoring and management of modern slavery risks. Planned improvements for the future include:

- Greater mapping and understanding of supply chain – Whilst the WorkPac Group carefully selects and engages its direct supply chain, working with suppliers to identify and review subsequent levels of the supply chain will improve visibility and risk management;
- Increasing awareness and knowledge of modern slavery – Whilst key personnel within the WorkPac Group are aware of modern slavery and management practices, knowledge will be increased for all internal staff thorough training and awareness campaigns; and
- Improving the capacity to report any alleged modern slavery – Mechanisms are available for feedback and whistleblowing, but these could be made more accessible and provide greater confidence of anonymity for anyone reporting.

## 6. Consultation

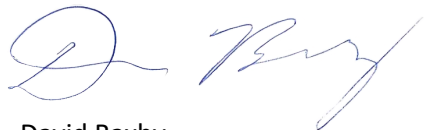
As outlined in the Reporting Entity Section, the WorkPac Group Pty Ltd is the parent company of the WorkPac Group, which encompasses WorkPac and its wholly owned or controlled subsidiaries. Further details of all companies in the WorkPac Group are outlined in WorkPac's Annual Report – 30 June 2022. Its subsidiaries WorkPac Pty Ltd and WorkPac Mining Pty Ltd are also reporting entities under the *Modern Slavery Act*.

WorkPac actively engaged with and consulted with all members of the WorkPac Group in the development of this statement. All members of the WorkPac Group were involved with the implementation of the Modern Day Slavery Policy, as the WorkPac Group shares common Board Members; Executives; and Managers and generally operates under policies and procedures for the whole Group, ensuring consistency across the Group.

Several management committee meetings were also conducted at frequent intervals to strengthen the monitoring and review of WorkPac's systems, including the Modern Day Slavery Policy, by the Executive and Board of Directors.

## 7. Endorsement

This statement was approved by WorkPac's Board of Directors on the 21 December 2022, pursuant to clause 14(2)(d)(ii) of the *Modern Slavery Act 2018*.

A handwritten signature in blue ink, appearing to read "David Baxby".

David Baxby

Chairman