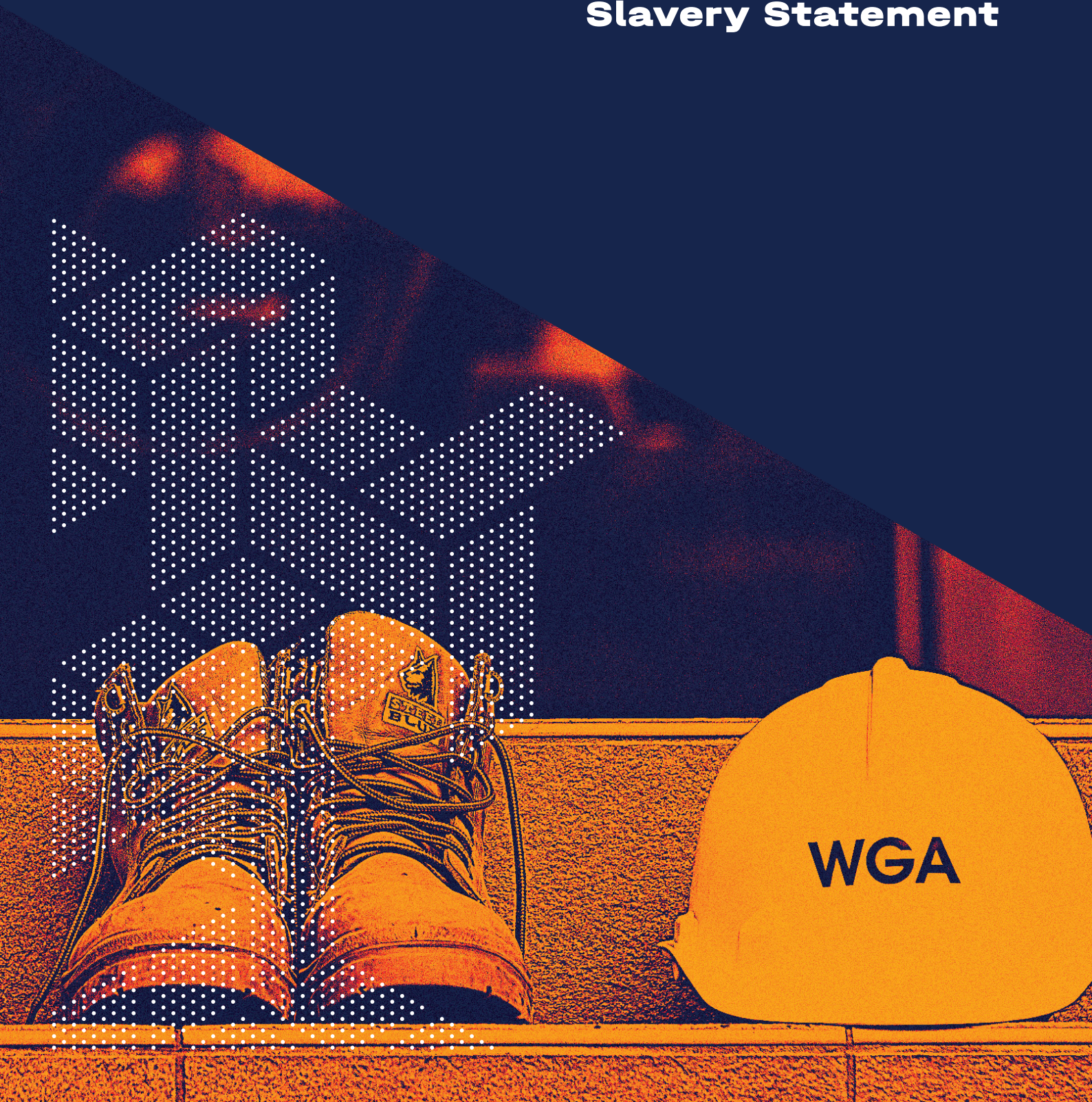


# WGA

## FY24 Modern Slavery Statement





# WGA





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# From our Joint Managing Directors

At WGA (“we” “us” “our”), we place people, together with enjoyment in what we do, at the heart of our operations and business.

Accordingly, last year we nominated to submit an annual voluntary Modern Slavery Statement (“**Statement**”) ahead of meeting the reporting threshold as prescribed by the Modern Slavery Act 2018 (Cth).

FY24 being our first year as a mandatory reporting entity, we are proud to present a statement that encompasses our commitment to continuously build on and improve on our Modern Slavery Compliance Framework and program.

Whilst we may highlight our progress in this statement, we recognise that there is a lot of work to come. It is our intention to openly share our progress and maturity journey.

**It’s not just the outcome; it’s the journey to get there.**

At a glance, our key progress items for this year include:

- Obtained further oversight over our tier 1 suppliers and commenced supply chain due diligence down to tier 2 level
- Rolled out interactive awareness training to WGA employees and suppliers
- Risk matrixed and screened 743 suppliers
- Issued 199 Modern Slavery questionnaires



**Ben Stapleton**  
Joint Managing Director



**Nathan Silby**  
Joint Managing Director





## BOARD APPROVAL

On behalf of the Board of WGA Group Holdings Pty Ltd, I am pleased to present WGA's second annual Modern Slavery Statement relating to the reporting period of 1 July 2023 to 30 June 2024.

This statement, pursuant to section 13 of the Act was approved by the board on behalf of the listed reporting entities on **4 December 2024**.



**Susan Forrester**  
Chair



## WHAT IS MODERN SLAVERY?

The Walk Free Foundation defines Modern slavery as situations of exploitation in which a person cannot refuse or leave because of threats, violence, coercion, deception, or abuse of power.

Modern slavery is an umbrella term and includes:

- Human trafficking (as defined in the UN Trafficking in Persons Protocol)
- Debt bondage
- Forced marriage
- Slavery and slavery-like practices (as defined in the Slavery Convention, 1926)
- Forced labour
- The worst forms of child labour (as defined in the Worst Forms of Child Labour Convention, 1999 (No. 182))

<https://www.walkfree.org/what-is-modern-slavery/>





# WGA





# 1—Who we are

Founded in 1982, WGA is a multi-disciplinary, award-winning engineering and project management consultancy operating in Australia and New Zealand.

We are committed to upholding high ethical standards within our operations and in the operations of those we do business with.

Our work is guided by our values and our vision to develop long-term and collaborative relationships with our customers, suppliers and our community more broadly.

Additionally, we pride ourselves on continuously adding value to our customers by providing streamlined access to a broad range of integrated services.

## REPORTING ENTITY

The reporting entity for this Statement is WGA Group Holdings Pty Ltd ABN 86 649 953 980 ("WGAGH") and has been prepared on behalf of the WGA operating entities as described on page 8 for the reporting period 1 July 2023 to 30 June 2024.



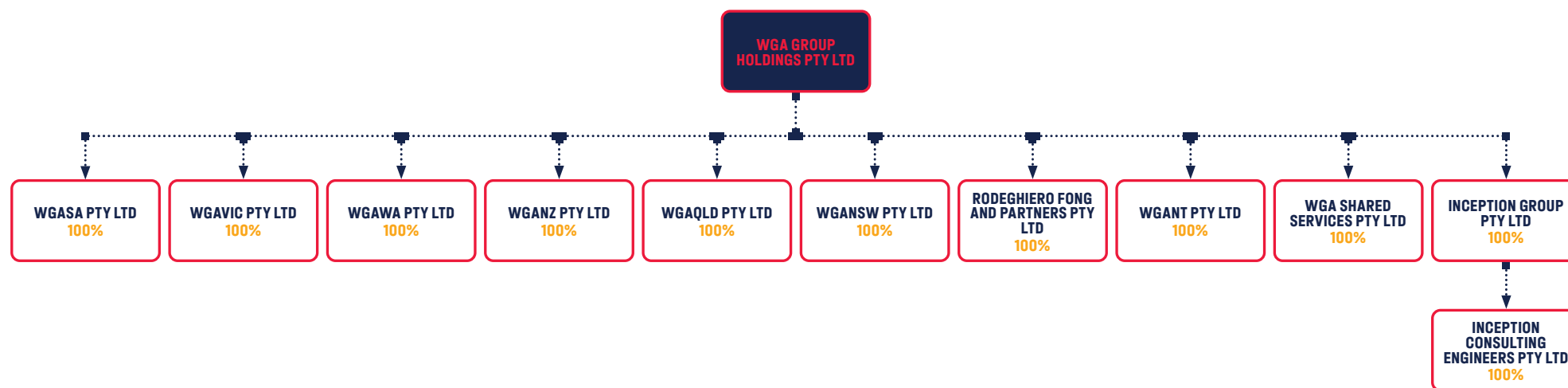


## 2—Structure, Operations and Supply Chains

### 2.1 STRUCTURE

The WGA Group of Companies (“WGA Group”) comprises of the following wholly owned subsidiary entities to WGAGH:

- WGASA Pty Ltd
- WGAVIC Pty Ltd
- WGAWA Pty Ltd
- WGANZ Pty Ltd
- WGAQLD Pty Ltd
- WGANSW Pty Ltd
- Rodeghiero Fong & Partners Pty Ltd
- WGANT Pty Ltd
- WGA Shared Services Pty Ltd
- Inception Group Pty Ltd
- Inception Consulting Engineers Pty Ltd



This statement has been prepared on behalf of the following WGA operating entities within the WGA Group, with each of the WGA Group entities having been consulted in the process of preparing this statement.

Our WGA Group registered office is 60 Wyatt Street, Adelaide SA 5000.



## 2.2 GOVERNANCE

<b>WGAGH BOARD</b>	Our Board of nine Directors, consisting of seven Executive Directors and two Non-Executive Directors provides strategic oversight and leadership, ensuring effective governance, management, and business performance aligned with the Board-approved strategy.
<b>BOARD SUB-COMMITTEES</b> <ul style="list-style-type: none"> <li>• Risk and Opportunity</li> <li>• People and Culture</li> <li>• Environmental, Social, Governance (“ESG”)</li> </ul>	These subcommittees provide focused oversight, strategic input, and well-considered recommendations to the Board on matters of significant importance.
<b>EXECUTIVE LEADERSHIP TEAM (“ELT”)</b>	Our ELT comprises leaders from key functions across WGA. They are responsible for the day-to-day management of the business including our people, client service, quality, and financial performance.
<b>MODERN SLAVERY COMPLIANCE COMMITTEE (“MSCC”)</b>	<p>The MSCC is responsible for identifying and managing Modern Slavery business risks through compliance and due diligence. MSCC actions and updates are communicated to ESG Board Sub-Committee and as appropriate escalated to the WGAGH Board.</p> <p>This committee aims to:</p> <ul style="list-style-type: none"> <li>• Develop risk awareness and a culture of risk management that aligns with our core values.</li> <li>• Investigate reports of suspected modern slavery. If they occur, ensures all applicable stakeholders are engaged, and implements remediation strategies.</li> </ul> <p>If a modern slavery incident is suspected within our organisation or supply chain, WGA would take all necessary steps to investigate, mitigate, and prevent any further incidences.</p> <p>In this remediation framework, WGA would seek to take a victim-centred approach, with reference to United Nations Guiding Principles.</p>

## 2.3 OUR PEOPLE





## 2.4 WGA RFP JOINS WGA GROUP

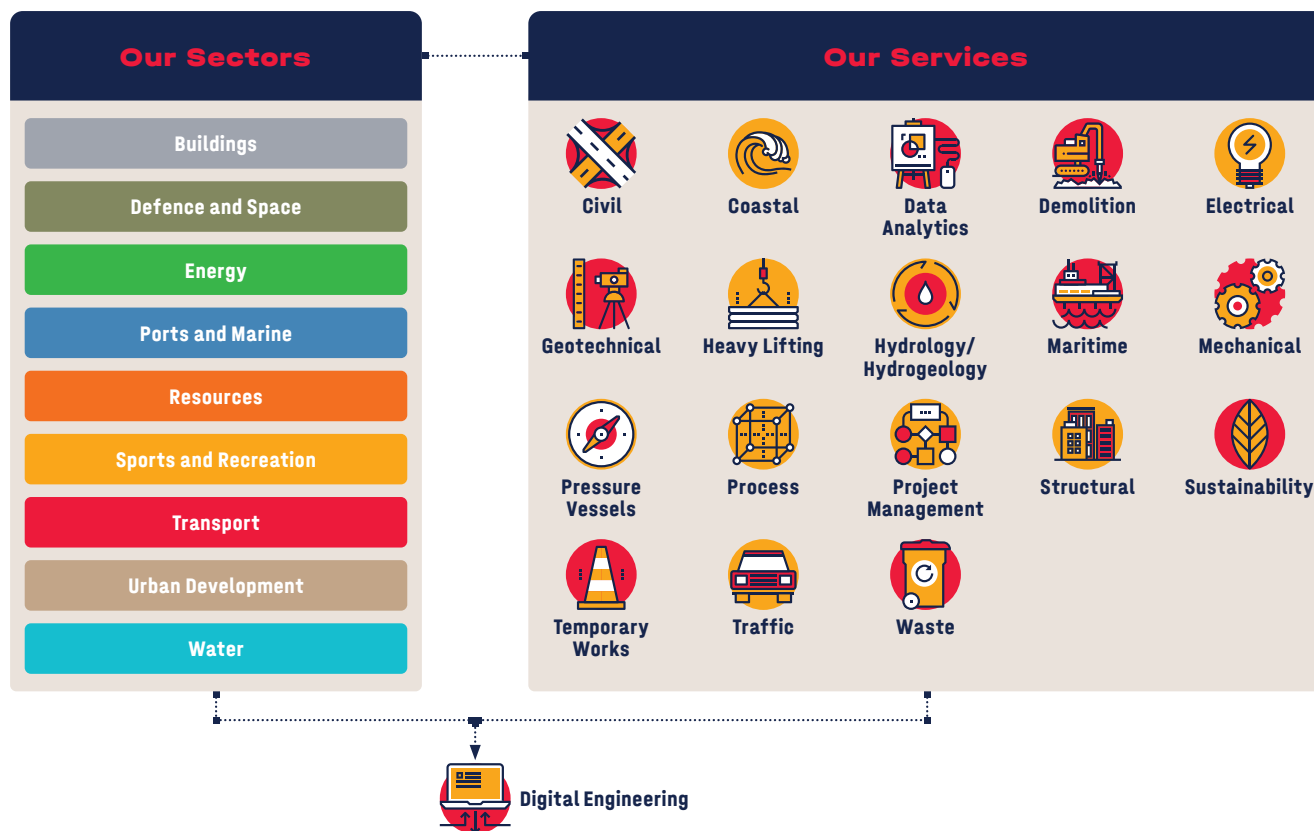
Following a successful two-decade partnership in the Northern Territory with Rodeghiero Fong & Partners Pty Ltd (“WGA RFP”) WGAGH acquired WGA RFP during the reporting period. This strategic acquisition marks a significant milestone for both companies, solidifying our commitment to the region and enhancing our ability to serve our valued clients.





## 2.4 OPERATIONS

We provide services in the following market sectors:



## MAKING A DIFFERENCE

We aspire to be the change that the world needs. We want to be known as the people whose work leads to a better world.

We have already made some significant strides in this journey, and we are eager to achieve more.

## 2.5 SUPPLIER RELATIONSHIPS AND PROCUREMENT

WGA recognise that suppliers are integral to our operations and our ability to provide the highest quality of services to our clients.

We believe that our suppliers should share our values and comply with our high ethical, quality, environmental, health and safety standards. We view our suppliers as partners and consider their alignment with our standards essential.

Our Supplier Code of Conduct outlines our expectations of our suppliers. The contents and the expectations outlined in our Supplier Code of Conduct are outlined further in Criteria 4.

WGA predominantly engages with Australian or New Zealand-based suppliers in the aim to support local suppliers in our various locations where possible.

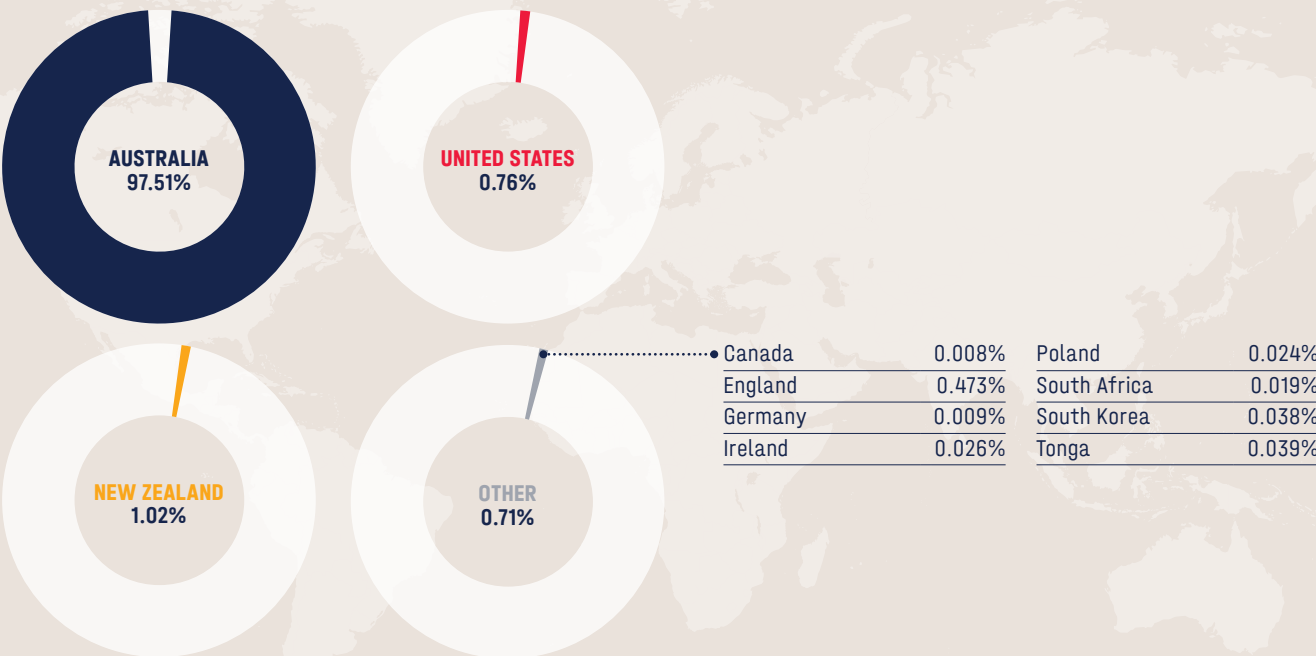
2.6 SUPPLY CHAINS

To carry out our operations, WGA requires a range of suppliers to provide us with products and services. The major categories of procurement include:

- Property and operations
- Project Consultants including heritage, surveying and laboratory testing
- Drillers for investigative services
- Professional services
- Travel and hospitality

TIER 1

Whilst most of our Tier 1 suppliers are based in Australia, 2.5% of our suppliers are based internationally (Canada, England, Germany, Ireland, New Zealand, Poland, Singapore, South Africa, South Korea, Tonga, USA).



TIER 2

During this reporting period, we have identified the locations of some of our Tier 2 suppliers. Amongst our Tier 2 suppliers, 84% are based in Australia and 16% are based in Canada, China, Denmark, France, Indonesia, Italy, Japan, Malaysia, New Zealand, Romania, United Kingdom, and United States.



# 3—Risks of Modern Slavery

## 3.1 OUR UNDERSTANDING OF RISKS

WGA understands that risks of modern slavery can present in operations and supply chains due to various factors. Modern slavery is a challenging global issue due to the complexity of supply chains in an interconnected world. Many factors must be examined to determine where higher risks of modern slavery may present in our supply chains.

WGA undertakes its risk assessments in accordance with the UN Guiding Principles (“UNGP’s”), in particular the “cause, contribute to and directly linked to” framework:

CAUSE	An entity causes the modern slavery itself via its activities or omissions which results in harm
CONTRIBUTE TO	Activities or omissions by an entity which facilitate, enable or incentivise modern slavery and harm
DIRECTLY LINKED	An entity being linked to harm through its products, services or business relationships

Due to this complexity, WGA's risk matrix considers a wide range of factors. To determine the risk levels, we have regarded all aspects with the help of our third-party advisers and referred to definitions and ratings listed by the [www.walkfree.org/global-slavery-index](http://www.walkfree.org/global-slavery-index)

In conjunction with the UNGP's, WGA's risk matrix considers various risk factors when assessing the modern slavery risk of a supplier. The risk matrix considers the following risk factors:

### INDUSTRY BASED RISKS

Certain industries carry heightened modern slavery risks due to certain characteristics, products, and processes. Some key indicators of modern slavery include the use of child labour, migrant workers, and the engagement of labour recruitment agencies.



### PRODUCT AND SERVICES BASED RISKS

Certain products and services have a higher risk of modern slavery due to how they are processed, provided, or used. Some indicators of modern slavery include the supplier being significantly cheaper than the market average, excessive working hours (including significant overtime) and short delivery timeframes.



### GEOGRAPHIC BASED RISKS

Suppliers in certain countries present a higher risk of modern slavery than others. Generally, countries with poor socioeconomic status, poor governance, conflict, and migration flows present a higher risk of modern slavery.



### ENTITY BASED RISKS

Suppliers and other entities that have for example, poor governance structures and/or treat their employees poorly present a higher risk of modern slavery. Indicators of these entity-based risks include poor procurement practices, non-compliance with labour standards and/or human rights and poor site audit results.



WGA also takes into account the “risk factors” associated with modern slavery. These factors include indicators or situations which are not direct evidence of actual modern slavery, but may suggest broader modern slavery practices, or particular vulnerabilities to falling into modern slavery practices, within the supplier. Some examples of risk factors include:

- Significant overtime hours and/or failure to pay overtime rates
- Lack of personal protective equipment (PPE)
- Failure to pay minimum wage or living wage

**In identifying our modern slavery risks, we consider whether we cause, contribute to, or are directly linked to any modern slavery.**

## OPERATIONAL RISKS

WGA’s operations are located solely within Australia or New Zealand which are jurisdictions with a low prevalence of modern slavery. We acknowledge that despite operating in low-risk jurisdictions, we are not immune to the effects and risks of modern slavery.

We operate in an industry that is highly regulated and within our operations, our processes, and procedures to mitigate modern slavery risks include:

- Paying all employees in accordance with the relevant Australian and New Zealand laws and requirements.
- Providing avenues for reporting concerns or grievances through various mechanisms, including through our whistleblower mechanism.
- Equip our employees with safety training, procedures, tools, and personal protective equipment.
- Supporting our employees through our employee assistance program.
- Providing modern slavery awareness training for all WGA employees.

## SUPPLY CHAIN RISKS

Like all entities, WGA is not immune to the risks of modern slavery. The key risks for WGA arise within our supply chains, particularly deeper within and beyond the Tier 1 level.

Whilst 97.5% of our Tier 1 are based in Australia, as WGA delves deeper into our supply chains, we anticipate that the geographical locations of our suppliers will expand, altering the associated risk profiles.

Using the “cause, contribute to and directly linked to” framework, the heightened modern slavery risks for WGA are:

INDUSTRY/SECTOR	RISK RELEVANCE
Excavation, building and construction	<p>Globally, around 18% of modern slavery victims are found in the construction industry. Supply chains associated with this industry can be long and complex, and entities often lack visibility over these supply chains.</p> <p>WGA engages with subcontractors for investigative/drilling services and other subcontractors and professional services subconsultants.</p> <p>Whilst our Tier 1 suppliers predominately operate in Australia or New Zealand and carry out projects locally, we recognise that there is still an inherent risk associated with this industry.</p>
Cleaning and Facilities Management	<p>The cleaning and facilities management industry has been identified as a key risk area in Australia. The provision of cleaning services in facilities management poses concerns due to complex contracting, obscuring labour conditions and leaving vulnerable workers open to exploitation.</p> <p>WGA engages with cleaning companies to maintain its operations. Given the prevalence of these suppliers in our supply chains, this is a high-risk industry for WGA. Base-skill labour industries can drastically elevate when combined with high-risk geographical locations.</p>
Branded clothing and merchandise	<p>The textile and merchandise industries are considered high risk for modern slavery due to their complex and often opaque supply chains. Products can be manufactured in countries where workers, including children, can be exploited through forced labour, low wages, and poor working conditions. The demand for cheap goods exacerbates this issue.</p> <p>WGA procures branded clothing and PPE for staff use as well as promotional merchandise.</p>

## PRODUCT AND SERVICES BASED RISKS

WGA acknowledges the complexities of addressing modern slavery and achieving compliance with the requirements of the Act.

The actions undertaken in this reporting period are outlined as follows:



# 4—Actions to Address Modern Slavery

During this reporting period, WGA has focused on delving deeper into its supply chains beyond its Tier 1 suppliers.

## SUPPLIER PORTAL

The foundation of our Modern Slavery Compliance Framework continues to be our supplier portal (“Portal”). When engaging new suppliers and on an annual basis thereafter, due diligence is performed via the Portal as part of our certified Business Management System.

## RISK MATRIXING AND SCREENING



During this reporting period, we have undertaken risk matrixing and screening on 743 of our suppliers (the risk matrix criteria are outlined in Criteria 3). The risk screening process screens suppliers for modern slavery risk and broader ESG-related risks for a holistic risk assessment.

We screen our suppliers against key risk areas including:

- **Integrity risks** – e.g., bribery and corruption
- **Environmental, Social and Governance risks** – e.g., environmental degradation, modern slavery.
- **Data and Cyber risks** – e.g., data security
- **Operational and Quality risks** – e.g., product and service quality
- **Identity risks** – e.g., transparency risks
- **Financial risks** – e.g., financial irregularities

The Modern Slavery Compliance Committee reviews any adverse results found during the screening process to determine what further due diligence is required and whether to cease or proceed with onboarding the supplier. No adverse findings relating to modern slavery or human rights breaches have been presented in this reporting period.

## MODERN SLAVERY QUESTIONNAIRES



During this reporting period, we have issued 199 questionnaires. Our modern slavery questionnaire is tailored to WGA based on the specific risks in our industry and further tailored to the supplier based on their industry and/or individual risk profile.

## REFRESHER DUE DILIGENCE

Our Tier 1 suppliers, who were initially risk screened and risk matrixed in FY23, have undergone another round of due diligence in this reporting period, ensuring they meet our current risk screening and matrixing standards. This process will continue in all future reporting periods, including any suppliers deeper in our supply chains identified through our supply chain tracing projects as outlined below.

## TIER 2 SUPPLY CHAIN TRACING

In this reporting period, we commenced Tier 2 supply chain tracing with two of our suppliers who provide branded clothing and merchandise to WGA. These suppliers were issued supply chain tracing questionnaires due to the heightened risks associated with linen and cotton suppliers.

## CASE STUDY

WGA engages with a supplier for branded clothing for our employees. Whilst the supplier is based in Australia, the supplier was assessed as high risk during our risk matrixing process due to the industry in which the supplier operates.

Uniforms, linen and cotton industries are considered high risk for modern slavery due to the prevalence of forced labour in these supply chains and because of the complexity of these supply chains which make it hard to conduct due diligence and trace down these supply chains.

Whilst the predicted annual spend on this supplier was below the spend aspect of our due diligence threshold, we chose to issue this supplier with a modern slavery questionnaire to understand the supplier’s suppliers and enable WGA to start tracing these supply chains.



### SUPPLIER EXPECTATIONS

Our expectations regarding modern slavery are clearly and effectively communicated via our:

- Modern Slavery Policy;
- Supplier Code of Conduct; and through
- Modern slavery clauses in our contractual terms and conditions.

Further, we prohibit subcontracting any portions of works to third parties without prior written approval.

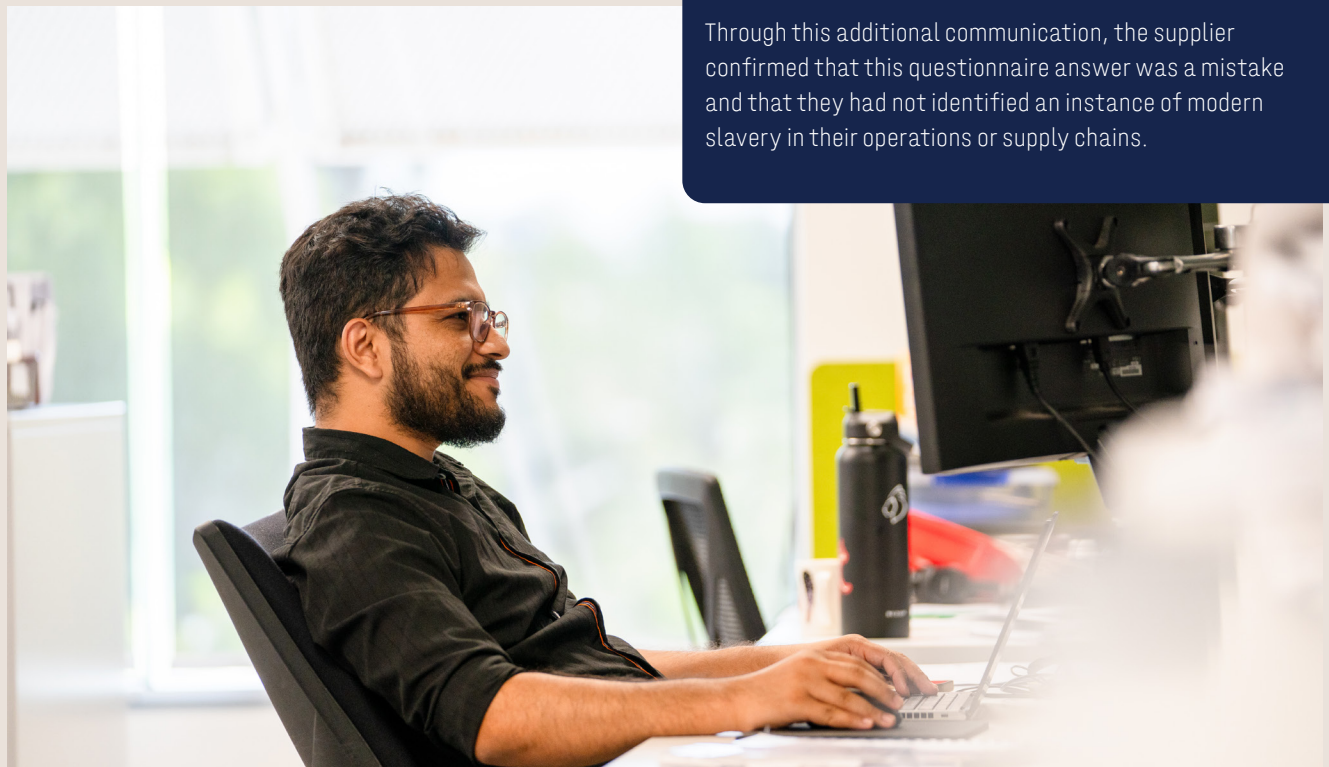
### EMPLOYEE TRAINING



WGA introduced modern slavery awareness training for all employees in this reporting period to assist our workforce in understanding why taking action to prevent modern slavery is important. As of 30 June 2024, 92% of WGA's employees had undertaken modern slavery training.

The training includes:

- What is modern slavery, including the prevalence of modern slavery globally;
- How everyone has a responsibility to create change to reduce the risk of modern slavery;
- What WGA does as part of its compliance obligations under the Modern Slavery Act 2018 (Cth); and
- Providing a contact for concerns of suspected modern slavery.



### SUPPLIER MODERN SLAVERY TRAINING

During this reporting period, we prepared and issued modern slavery training to two of our suppliers who are high-risk suppliers and/or demonstrated a lack of understanding of their modern slavery risks during the questionnaire process.

This training is also being made available for any supplier via our Portal who wishes to improve their understanding and uplift their maturity.

### ENGAGEMENT OF THIRD-PARTY ADVISORS

We acknowledge that addressing modern slavery is complex. To assist us on our modern slavery compliance journey we engage third-party advisors.



### CASE STUDY

During the supplier due diligence process, one of our suppliers responded "yes" to the following question in the questionnaire:

"Have you ever identified slavery, servitude, forced or compulsory labour and/or human trafficking in your operations or supply chains".

To understand this response, we communicated with this supplier to confirm their response and clarify whether they had identified an instance of modern slavery in their supply chains.

Through this additional communication, the supplier confirmed that this questionnaire answer was a mistake and that they had not identified an instance of modern slavery in their operations or supply chains.



## 5—Assessing Effectiveness

In this reporting period, our focus has been to expand our due diligence on the modern slavery risks deeper within our supply chains and to establish ongoing due diligence procedures for our suppliers.

We believe our due diligence and risk identification procedures are currently working well. Our Portal has been effective in identifying and recommending several additional suppliers in high risk industries for further due diligence even though they fell below the spend aspect of our due diligence threshold.

With our third-party advisors, we have reviewed what was undertaken during the reporting period and developed some action items for the next reporting period, some of which are outlined in Criteria 7.

As stated previously, in each reporting period we are committed to continuously build on and improve on our Modern Slavery Compliance Framework and program. We will do this by continually assessing our processes and systems to strengthen their effectiveness.





## 6—Consultation

This Modern Slavery Statement is prepared by WGAGH on behalf of the Group.

Key teams and people who work across the WGA Group were engaged throughout this reporting period to drive the key initiatives undertaken in the drafting of this Modern Slavery Statement, including key managers, procurement, learning and development, and broader team members in executive leadership. Accordingly, consultation across our Group was extensive.

Our third-party advisors consult with WGA on legislative requirements under the Act and guide WGA in developing action items for each reporting period to ensure WGA is complying with the continuous improvement approach that underlies the Act. Our third-party advisors have reviewed this statement for this purpose.



## 7—Looking Forward

In the next reporting period, we will focus on further expanding our oversight of suppliers deeper in our supply chains. Accordingly, some key action items for the upcoming reporting periods are as follows:

- Expanding our supply chain tracing efforts;
- Undertaking a review of our existing due diligence thresholds with consideration to include a higher importance of risk - thus allowing WGA to focus our due diligence efforts on our highest risk suppliers;

- Implementing policy frameworks surrounding ethical and sustainable procurement targets for WGA; and
- Reviewing our employee and supplier training processes.

Alongside the above action items, WGA will continue to constantly assess and evolve our modern slavery compliance framework based on any changing circumstances to reduce the risk of modern slavery occurring in our operations and supply chains.

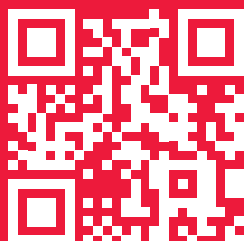




# Mandatory Reporting Criteria Guide

MODERN SLAVERY ACT 2018 (GTH) CRITERIA	PAGE REFERENCE
Criterion 1 - Identify the reporting entity	7
Criterion 2 - Describe its structure, operations and supply chain	8
Criterion 3 - Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or control	13
Criterion 4 - Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	15
Criterion 5 - Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	17
Criterion 6 - Describe the process of consultation with any entities the reporting entity owns or controls	18
Criterion 7 - Other information the reporting entity considers relevant	19

# WGA



[WGA.COM.AU](http://WGA.COM.AU)

[WGANZ.CO.NZ](http://WGANZ.CO.NZ)