



# MODERN SLAVERY STATEMENT

## JULY 2023 – JUNE 2024



## Disclosure

This Modern Slavery Statement has been prepared in accordance with the Modern Slavery Act 2018 (Commonwealth Act) for The Trustee for THE KJ WALLACE DISCRETIONARY TRUST for the financial year ending 30 June 2024.

The trustee is committed to understanding and addressing modern slavery risks within our business. The trustee is subject to the Modern Slavery Act 2018. The statement is pursuant to the Act and holds the position to end modern slavery worldwide.

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

<p><b>Modern Slavery</b></p>	<ul style="list-style-type: none"> <li>• Situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.</li> </ul>
<p><b>Human Rights</b></p>	<ul style="list-style-type: none"> <li>• Universal recognised moral principles or norms that establish standards of human behaviour and often protected by both national and international laws.</li> </ul>
<p><b>Ethical Sourcing</b></p>	<ul style="list-style-type: none"> <li>• Suppliers and vendors meet certain ethical standards, making a positive social impact and practicing environmental sustainability.</li> </ul>
<p><b>Employment Conditions</b></p>	<ul style="list-style-type: none"> <li>• Rules, requirements, and policies an employer and employee agree to abide by during the employee's service to the company.</li> </ul>

## Reporting Entity, Consultation & Introduction

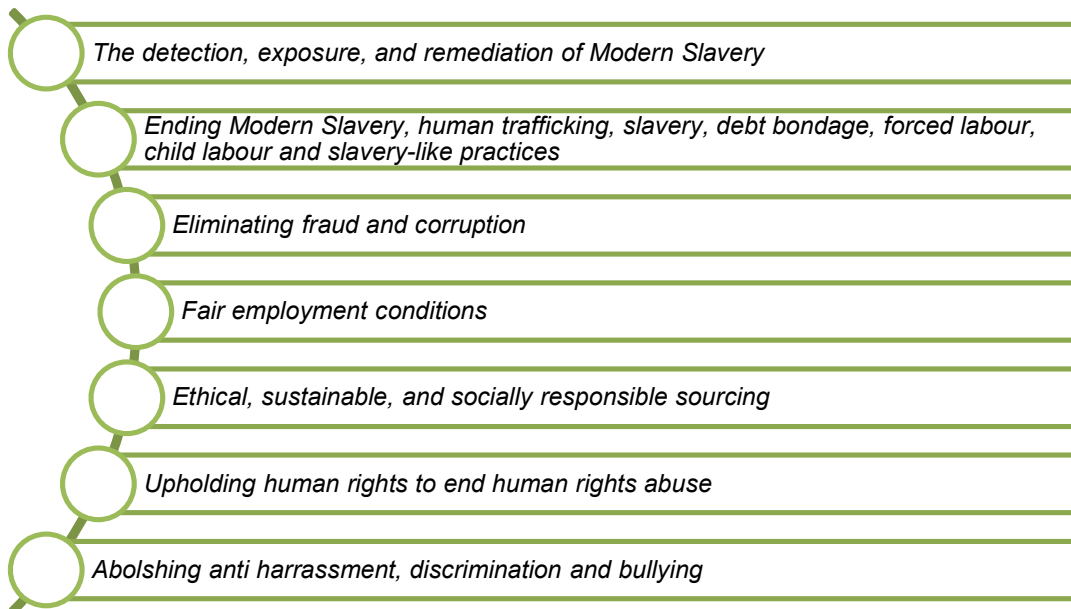
This is a statement for the entity “The Trustee for the KJ Wallace Discretionary Trust” (ABN 77 640 068 488), known as ‘ETS Infrastructure Management Pty Ltd’, ‘Falbury Pty Ltd’ and ‘Eastern Tree Services’. The statement applies to the following controlled reporting entities.

- Specialist Consulting Services, known as ‘ETS Infrastructure Management’ (ABN 38 070 013 884)
- Centrogen Pty Ltd (ABN 47 063 665 172)
- Gippsland Contracting Pty Ltd (ABN 65 104 187 911)

The Trustee for KJ Wallace Discretionary Trust controls the mentioned entities but does not own them. There is an overarching corporate structure, for which all entities are controlled by the one senior management team. This management team collaborate with key members of the entities throughout the year to develop this statement. The management team, along with the corporate support team ensure the entities actively engage with the Modern Slavery framework and policies. The same policies and strategies are applied across all entities controlled by the Trust.

For this statement, we will refer to ETS, however this statement applies to all entities controlled by the Trust.

### ETS is committed to



# Our Values

All workers have a responsibility to ensure that colleagues, as well as customers and other stakeholders, are treated with dignity, respect and always in a professional manner in line with our values which are described below.

Our purpose is working together to make communities safer.

- **Stand Tall** – Doing the right thing always, acting with honesty and integrity, and being proud of what we do.
- **Grow Strong** – Always improving on what we do, playing to our strengths, but never forgetting our roots.
- **Canopy of Trust** – Working together, supporting and encouraging each other and being accountable for actions.
- **Branch Out** – Seek opportunities, embrace change and deliver on our promises.



## Our Services

ETS is one of Australia's leading infrastructure management companies in Australia. It is a privately owned company, which commenced operation in Victoria in 1981 as a specialised 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

ETS service offering has diversified over the years, whilst remaining true to its foundations. ETS has played a pivotal role in advancing Australia's infrastructure sector, leading with innovation and setting standards for excellence.

ETS operates across multiple sectors. Since 1981, ETS has focused on delivering effective, efficient and sustainable vegetation management to power companies, State and Federal Government, National Parks, large developers, property managers and owners.



### Vegetation Management

- Utility asset and lanscape management, hazard tree removal, arborist service, mechanical clearing, slashing and mowing, herbicide control programs, bushfire mitigation and distaster response and recovery.



### Water

- We provide a host of plumbing solutions including meter reading, meter testing, sub meter audits, backflow installation and eyewash station testing.



### Electrical

- Meter services are provided on behalf of the local network operators and retailers including Meter Reading, Meter Testing, Contestable Meter Installations, Aged Meter replacements and reconnections and disconnections.



### Fleet

- Our purpose build rebuild facilities are home to our in-house engineering, fabrication and maintenance teams. Our specialist mechanics service, maintain and rebuild our extensive fleet which has over 1500 different plant and machinery.



# ETS People

## Workforce, recruitment and labour hire

ETS has a relatively stable core of internal labour, growing significantly over the past few years. ETS now employs over 1100 personnel.

ETS does not engage in or support the following

- Any forced labour (exception being working within the Justice System)
- Child Labour as defined by 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

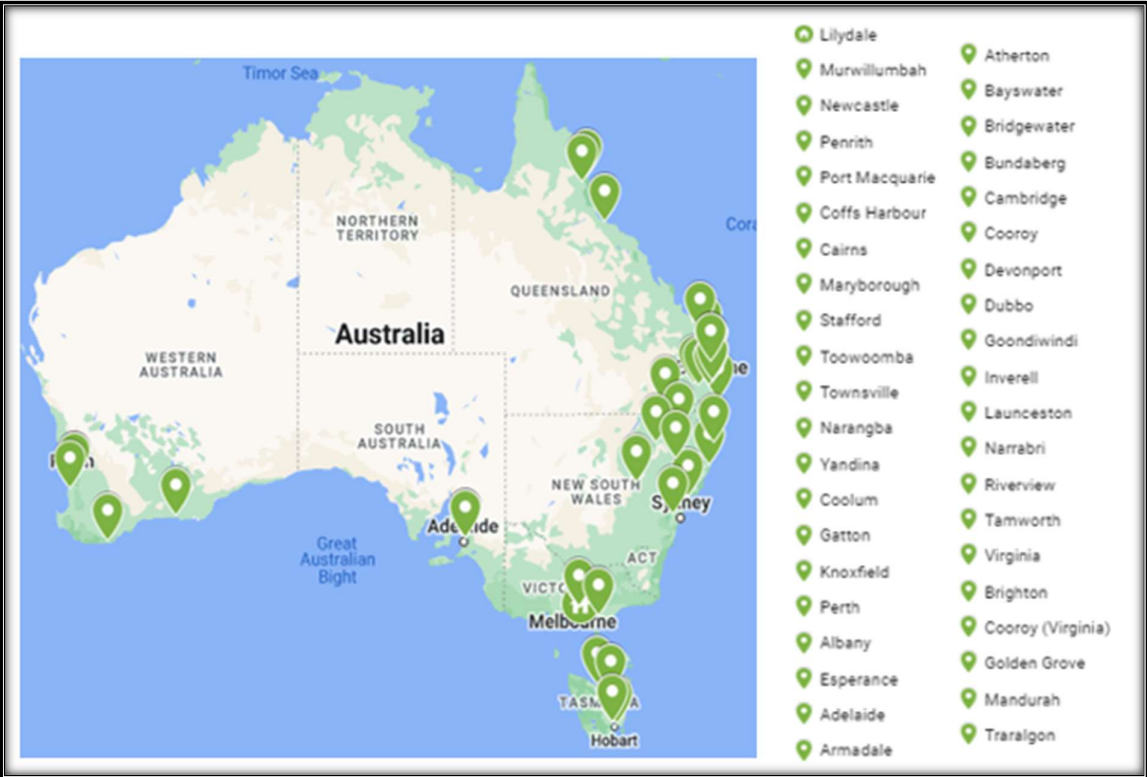
ETS value and observe all laws regarding corporate, social and environmental responsibility and workplace safety and protection, staff inclusion and diversity.

ETS is 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 world.

ETS understands compliance with relevant labour legislation is an ongoing commitment and requires continual effort.

# Where we operate

ETS geographic footprint spreads across metropolitan and regional Australia. Its head office is registered at 62 Industrial Park Drive, Lilydale, Victoria.



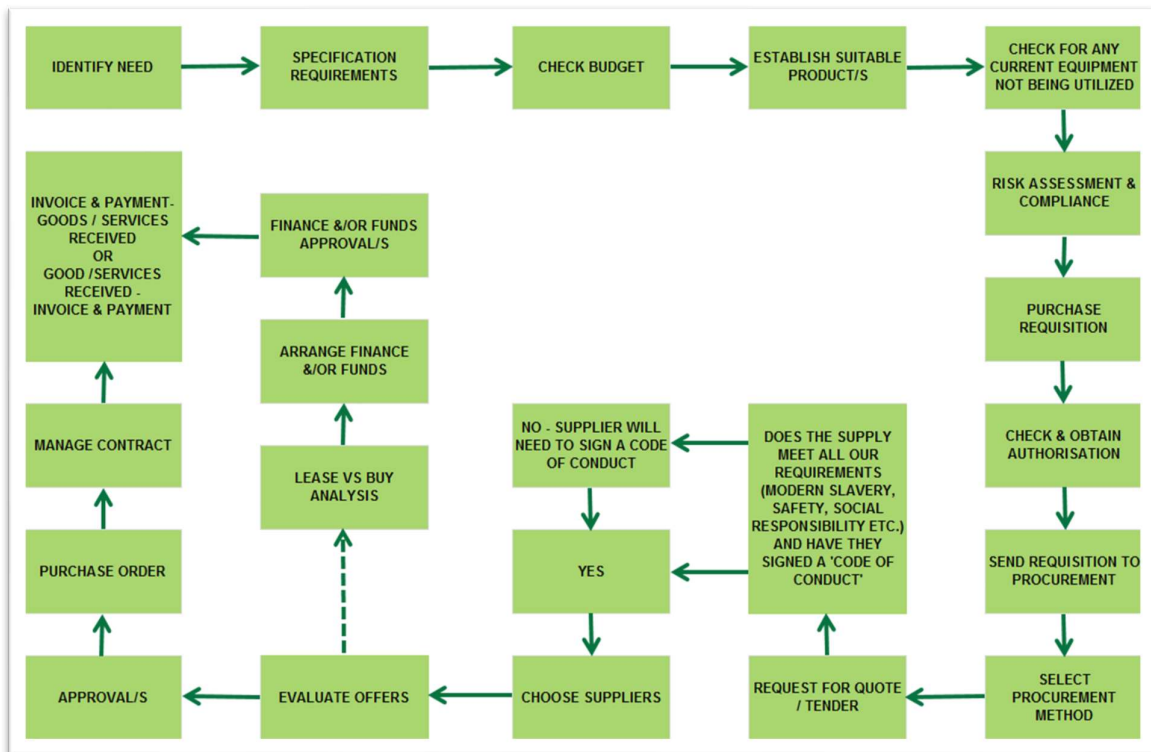
# Identifying modern slavery risks in our operations supply chain

## Supply Chain

As a service-based organization, compliant with all laws and regulations, there is a relatively low risk of modern slavery occurring within our supply chain and operations. ETS recognises 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.

ETS understands their responsibility to conduct our business ethically and this extends to our supply chain. ETS continually conducts due diligence and assesses the risk of modern slavery occurring throughout its supply chains and operations.

## Supply Chain Process





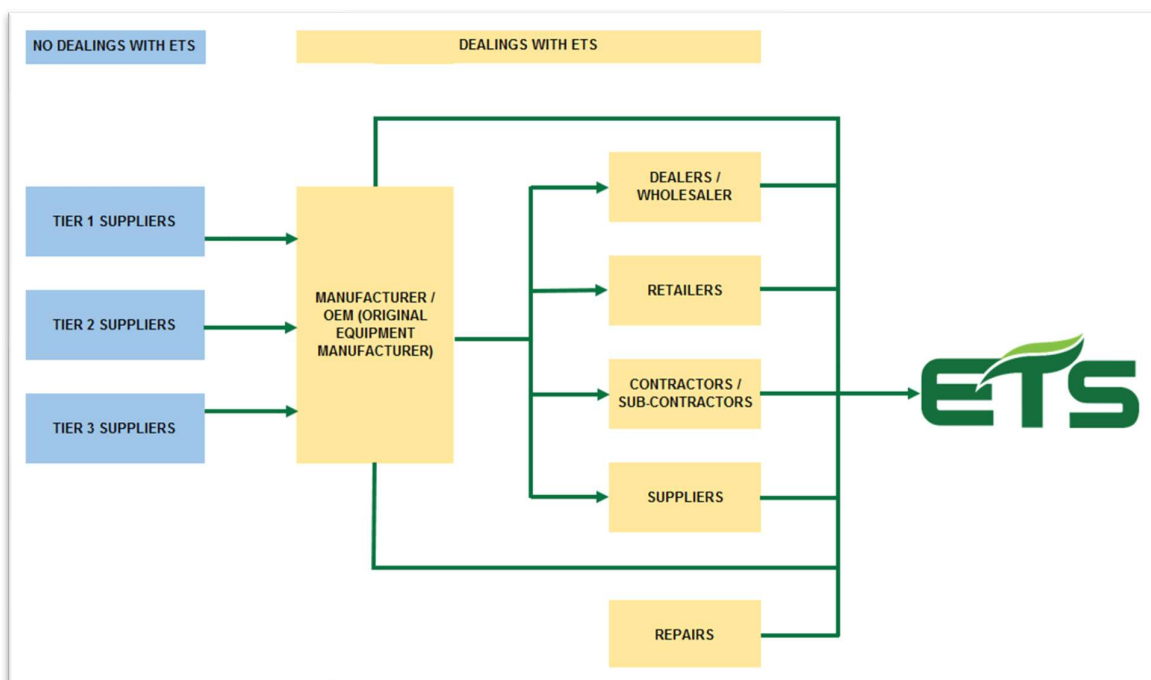
## ETS Will

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

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

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 and managing risk of modern slavery in our supply chain. It is a condition of ETS suppliers, their employees and subcontractors to adhere to ETS Modern Slavery Supplier Code of Conduct.

As part of our two-way relationship with our suppliers and customers, we request our suppliers complete Supplier Self-Assessment Questionnaires. These answers will provide a greater undertaking 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. Our customers also regularly ask that we complete their Modern Slavery questionnaires.

We will actively review the Modern Slavery register for information available regarding our suppliers. Purchases will only be made from suppliers with no suspicion of Modern Slavery practice. ETS intends to factor Modern Slavery due diligence into future procurement decisions.

ETS provides employees with clear conditions of employment, that detail their rights, work and pay conditions, and make provision for people who may require assistance to understand these conditions of employment. Employees are provided with detailed pay slips, that outline any deductions that have been made.

ETS has various policies in place to assist in addressing and mitigating the risk of Modern Slavery practices in our operations. The relevant policies include

- ❖ Recruitment Policy
- ❖ Procurement Policy/Standard
- ❖ Workers Handbook
- ❖ Fatigue Management Policy
- ❖ Equal Employment Opportunity Policy
- ❖ Diversity and Inclusion Statement
- ❖ Issue Resolution Procedure
- ❖ Workplace Behaviour Complaints and Disputes
- ❖ Whistleblower Policy
- ❖ Modern Slavery Supplier Code of Conduct

We monitor the compliance of all personnel signing off on the ETS Handbook Acknowledgement form, whereby committing to adhering to ETS policies.

## Assessing the effectiveness of these actions

ETS are committed to continually undertaking due diligence when contracting with suppliers. We will review our policies and procedures to ensure industry's best practice and to minimise our risk of Modern Slavery practices occurring within our supply chains.

ETS will assess the effectiveness of these actions by

- ❖ Monitoring the results of Self-Assessment Questionnaire
- ❖ Tracking any supplier non-conformance or issues
- ❖ Regularly reviewing areas for improvement and respond to emerging risks

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

A key part of supporting ethical standards is supporting ETS personnel, suppliers and clients to feel 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 suspicious 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 line with ETS Whistleblower Policy. This policy is outlined in the ETS handbook given to all employees and Subcontractors as part of their company inductions. ETS will be careful not to put the victims or survivors 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. 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.

Any instances or suspicions of modern slavery activities within our operations or supply chain are reported to our corporate management team. We will contact the supplier for further investigation and information and take responsive action where appropriate.

## Approval

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

Name: Kevin John Wallace

Title: Director

Date: 15.01.2025

Signature

A handwritten signature in black ink, appearing to read 'KJ Wallace', written in a cursive style.