



MODERN SLAVERY

WESTRAC'S ANNUAL MODERN SLAVERY STATEMENT (FY24)

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WesTrac



01

Modern Slavery Statement

WesTrac opposes all forms of modern slavery and is committed to lawful, ethical operations that respect human rights. Actions in FY24 reflect WesTrac's commitment to its values, ethical conduct, and maintaining a supply chain that is free from modern slavery.

Reporting Entity

This Annual Modern Slavery Statement has been prepared for WesTrac Pty Ltd, ABN 63 009 342 572, located at 128-136 Great Eastern Highway, South Guildford, WA, 6055 (WesTrac), and its wholly owned subsidiaries (together, WesTrac Group).

Reporting Entity Structure, Operations and Supply Chain

Structure

WesTrac is a wholly owned subsidiary of SGH Limited (SGH), ABN 46 142 003 469, located at Level 30, 175 Liverpool Street, Sydney, NSW, 2000. WesTrac subsidiaries include Sitech (WA) Pty Ltd, Sitech Solutions Pty Ltd, and Warrah Engineering Pty Ltd. WesTrac also has a material interest in Energy Power Systems Australia Pty Ltd.

Operations

WesTrac is the exclusive dealer of Caterpillar equipment in WA, NSW and the ACT operating from 30 branches within these locations. As of 30 June 2024, WesTrac employed approximately 4,900 people including team members on common law contracts, enterprise bargaining agreements, and through labour hire arrangements.

With a large geographical footprint and a diverse client base, WesTrac provides customers with a wide range of Caterpillar earth moving machinery and construction equipment, including responsible finance options and comprehensive whole-of-life management solutions.

Supply Chain

The majority of goods procured by WesTrac are sourced from Caterpillar for resale and include heavy machinery and components for construction and mining applications. Caterpillar is a global group headquartered in the USA with manufacturing operations in multiple countries.

Goods sourced from non-Caterpillar suppliers include items

used to modify, service, or maintain Caterpillar equipment such as fire suppression systems, lubrication systems, lighting solutions, communication equipment, technological solutions, hardware, and operational consumables. Goods are also procured to support business operations including tooling, stationery, clothing, merchandise, IT, and communication hardware. Additionally, suppliers are engaged to perform installations and modifications to Caterpillar equipment at WesTrac branches as needed.

Modern Slavery Risk in Operations and Supply Chain

Operations Risk

WesTrac has assessed the risk of modern slavery in its operations as low. However, WesTrac considers that there is a higher risk of modern slavery within the operations of service labour hire providers, contract services, and international recruitment providers.

88.7% of WesTrac's workforce is employed directly by WesTrac in accordance with Australian laws, applicable modern awards, and enterprise agreements. 11.3% of WesTrac's workforce is engaged indirectly through labour hire and contract service providers. WesTrac requires that labour hire providers meet all applicable laws.

Supply Chain Risk

The modern slavery risk associated with goods sourced from Caterpillar is assessed as being low due to the stringent controls that Caterpillar has in place. Caterpillar has undergone its own due-diligence to investigate modern slavery risks in its supply chain and has published its own [Slavery and Human Trafficking Statement](#), [Modern Slavery Statement](#), and [Human Rights Policy](#).

Overall, WesTrac considers the modern slavery risk associated with Caterpillar and its non-Caterpillar suppliers to be assessed as low.

Actions Taken by WesTrac to Assess and Address Modern Slavery Risks

During FY24, WesTrac assessed international suppliers providing used Caterpillar equipment. No evidence of modern slavery was found.

Additionally, suppliers previously identified as higher risk

MODERN SLAVERY

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02

were re-assessed. The assessment confirmed their practices remain consistent with WesTrac's values and requirements, with many taking significant steps to address modern slavery risks.

WesTrac remains proactive in mitigating modern slavery risks within its operations and supply chain.

Governance

WesTrac has implemented policies to ensure behaviours and values support the absence of modern slavery in its operations and supply chains. WesTrac's Modern Slavery Policy outlines WesTrac's obligations and remediation process if modern slavery is suspected. WesTrac's Code of Conduct and Supplier Code of Conduct are built on WesTrac's values and set out expectations and standards for all suppliers and employees to adhere to.

Employee Training

Employee training has been held to assist in early identification of modern slavery in the supply chain. Additionally, learnings from each year's reviews and actions are cascaded throughout the business.

Reporting and Remediation

WesTrac has a clear process for reporting and remediating modern slavery within its supply chain, supported by WesTrac's Modern Slavery Policy.

Any person who suspects any form of modern slavery is to report the incident to WesTrac's General Manager of Risk, Safety, and Security. Any suspected occurrence of modern slavery will be investigated by a third party due-diligence team to ensure impartiality in the investigation and remove any actual or perceived conflict of interest. Anonymous and external reporting is available should the reporting party desire anonymity through RightCall, which is WesTrac's external whistle-blower reporting hotline. Any submission received by RightCall is investigated independent of WesTrac and SGH.

If an occurrence of modern slavery is discovered, WesTrac will follow best practice guidance.

Supplier Covenants

WesTrac's standard terms and conditions for the purchase of goods and services include various covenants and warranties regarding modern slavery risk. Suppliers are required to warrant that they have thoroughly investigated their labour

practices, and those of their direct suppliers, to ensure there is no modern slavery within their supply chains. WesTrac is able to ensure compliance by having the right to audit suppliers.

Community Engagement

During FY24 WesTrac and SGH entities including Boral, Coates, SGH, Beach Energy, Seven West Media, Allight, Sykes, and Energy Power Systems Australia continued to hold quarterly meetings to share learnings in relation to the identification and management of modern slavery risk.

The working group expanded its knowledge library that includes supplier assessment results, supplier risks, and supplier remediation efforts, along with relevant supplier communications. Resources and references have been compiled to allow group members to gain further understanding of modern slavery in the supply chain and provide points of contact for assistance as required.

Supplier Checks and Monitoring

Supplier selection and onboarding due-diligence checks are undertaken on all new suppliers to ensure that suppliers are aligned to WesTrac business ethics and values; and have appropriate processes and controls in place to manage modern slavery risks. Onboarding checks vary and are tailored dependent on the supplier category, supplier location, and services to be provided.

Assessing Effectiveness of WesTrac Actions

WesTrac's actions and effectiveness for FY24 have been continuously monitored and reviewed by the Modern Slavery Steering Committee. Deficiencies or improvements are addressed as they arise and opportunities for continuous improvement are identified.

Consultation

WesTrac Group company representatives were consulted in the development of this statement to ascertain the modern slavery risk in the supply chain, and to ensure that information provided is true and correct.

Further Information

For further information regarding WesTrac's Modern Slavery Statement and actions please contact the Company Secretary at SMB-companysecretary@westrac.com.au.

MODERN SLAVERY

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Board Approval

This statement was approved by the board of WesTrac Pty Ltd on Tuesday, 03 December 2024.



Jarvas Croome

Director and Chief Executive Officer

Wednesday, 04 December 2024.