



Modern Slavery Policy Statement

Preamble

In accordance with the Modern Slavery Act 2018, this statement outlines the steps that WCL Management Services Pty Ltd t/as National Luxury Transport has taken and is continuing to take, to assess and reduce risks of modern slavery within our business and our supply chain, and our plans for review and improvement.

WCL Management Services has produced this Modern Slavery Statement for the reporting period 1 July 2022 to 30 June 2023 in accordance with the requirements of the Modern Slavery Act 2018.

Our Values

WCL Management Services aspires to be a leader in Social Accountability and Corporate Social Responsibility within the transportation management industry through the promotion of a positive culture respecting human rights and continuous improvement of working conditions.

This policy reflects 's commitment to ensure to the best of our ability that there is no modern slavery in any part of our business operations. We are committed to acting ethically and with integrity in all business dealings and relationships, and where possible, to ensure modern slavery is not taking place in our own business or supply chain. As part of our contracting processes, we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude.

Our business also expects its service providers, suppliers and contractors to share our commitment to act lawfully and ethically and to work to ensure that modern slavery is not taking place within its organisation or within its supply chain. WCL Management Services Pty Ltd does not own or control any other entity which requires external consultation regarding Modern Slavery to be applicable

The term 'modern slavery' describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Coercion, threats and deception can be explicit or implicit. The Modern Slavery Act 2018 (Cth) 'Act' defines modern slavery as including eight types of serious exploitation; trafficking in persons, slavery, servitude, forced labour, forced marriage, debt bondage, the worst forms of child labour and deceptive recruiting for labour or services. The worst forms of child labour means extreme forms of child labour that involve the serious exploitation of children, including through enslavement or exposure to dangerous work. The worst forms of child labour does not mean all child work. Under Australian law, modern slavery is defined in the Act. In the event of any inconsistency, the definitions in the Act take precedence over this policy.

Our Business

WCL Management Services Pty Ltd (ABN 14 161 742 696) t/as National Luxury Transport is a privately owned Australian Company registered in Wangaratta, Victoria, Australia. Our company operations include:

- Operator of school bus services throughout Northern & North East Victoria
- Operator of national secure ground transport services to the Commonwealth of Australia & Department of Defence
- Major event transport management services throughout Australia
- Charter bus services throughout Victoria & New South Wales

Our Supply Chain

WCL Management Services' supply chain is diverse in terms of the types of products and services it procures and the size of supplier entities it utilises for its operations. The majority of our supplier relationships are long-term and well-established, centered around engagement with locally-owned family businesses where possible. Therefore our suppliers are primarily located in Australia. Our supply chain primarily consists of 'Direct Suppliers' with whom WCL Management Services has a direct contractual relationship for providing the products and services required for its operations.

WCL Management Services' Direct Suppliers deliver the following goods and services to support the organisation:

- products and services, such as fuel, oils, lubricants, spare parts, tyres, uniforms, cleaning services, utilities (including telecommunications services) and information technology systems and services;
- maintenance services, including servicing, mechanical repairs, chassis/body repairs, windscreen repairs, and general tradesperson services;
- capital purchases, including the purchase of assets (buses and other vehicles), for depot facilities and operational equipment procurement; and
- professional services including advisory services for financial, legal, insurance, security and other technical matters in support of projects, and audit services

Within our supply chain, there are also 'Indirect Suppliers' who comprise of:

- suppliers of WCL Management Services' Direct Suppliers (such as suppliers of raw materials used in the production of goods);
- subcontractors of WCL Management Services' Direct Suppliers

Through our Corporate Governance processes, WCL Management Services undertakes annual risk assessment and mitigation planning across the organisation. Our risk assessment of our Supply Chain determined that our Direct Suppliers present less risk of modern slavery than our Indirect Suppliers because the Direct Suppliers are subject to greater screening and independent analysis as part of their selection and engagement with WCL Management Services.

Specifically, WCL Management Services utilises documents such as requests for tender, contracts, code of conduct, contract management and reporting mechanisms to stay vigilant and monitor, among other things, the risk of modern slavery in its direct supply chains.

Some key conclusions of our risk assessment of its Direct Suppliers were that most Direct Suppliers posed almost no to relatively low modern slavery risk because they possessed one or more of the following characteristics:

- a. they operate predominantly in Australia; approximately 90% of WCL Management Services' Direct Suppliers are headquartered in Australia;
- b. they deliver equipment/s, product/s or machinery that are technical or require sophisticated engineering and are therefore expected to have been sourced from countries posing low modern slavery risk and not involving the use of raw materials and/or practices commonly associated with modern slavery;
- c. they operate in industries that are subject to significant regulation with strong measures for employee protection.

WCL Management Services' supply chain has multiple tiers and the organisation acknowledges that there are certain industries, products, services and geographic regions which carry a higher risk of modern slavery. While the organisation can and does conduct due diligence for its Direct Suppliers, it has relatively less visibility and influence over its Indirect Suppliers. Based on guidance from the Department of Home Affairs and the Global Slavery Index 2018, the Directors arrived at the reasonable conclusion that although low, the supply of the following general categories of goods carried with it some inherent risks of concealed modern slavery practices along the supply chain which WCL Management Services may not be able to reasonably track, identify, assess and address:

Uniform and Personnel Protective Equipment	The apparel industry is associated with vulnerable populations in higher risk geographies – where possible, WCL Management Services seeks to procure only Australian-made uniforms for our staff
Information Technology (IT) equipment	Potential risk that the sourcing material used in the manufacture of IT equipment is linked to modern slavery practices
Fuels and lubricants	Potential risk that extraction of raw material is associated with vulnerable populations in higher risk geographies and the vessels used to transport fuels can expose the crew to forced labour and/or unacceptable working conditions
Spare parts (such as tyres)	Potential risk that the sourcing of raw materials used to manufacture some types of tyres, natural rubber etc. is associated with modern slavery practices since the process is labour-intensive and known to be associated with vulnerable populations in higher-risk geographies

WCL Management Services has a limited ability to engage with its Indirect Suppliers and is therefore unable to assess or monitor their practices to ensure compliance with human rights regulations, including modern slavery. Consequently, our direct and immediate focus in the reporting period and in the near future is to prioritise compliance by our Direct Suppliers which includes contractual commitments to cascade compliance through the supply chain to its Indirect Suppliers. As this process matures, the organisation may develop capabilities to expand its reach beyond such contractual requirements

Our Commitment

WCL Management Services, as a national transport operator is committed to managing our stakeholders and transport operations in a manner that fully complies with all relevant employment legislation and best practice guidelines.

We commit to:

- Rejecting any forms of modern slavery and human trafficking
- Promoting ethical business practices that protect workers from being abused and exploited and recognise that this commitment extends throughout our business and our supply chain
- Fostering an organisational culture that supports any individual in speaking up and reporting any actual or perceived modern slavery or human trafficking activities without fear and with the knowledge that these claims will be taken seriously

Our Governance Framework

WCL Management Services has a strong corporate governance framework that supports our organisation in continuous improvement and best-practice across the industries we service.

Our approach to corporate governance is to:

- Use proven frameworks of rules, relationships, and processes to direct & control our decision making and management of our organisation
- Understand that 'Governance' is different to 'Management'. Our directors have an obligation for effective Governance and are accountable for oversight, setting the strategy, managing our risk tolerance, policy, and culture. Our Management team are all about executing day-to-day operations.
- Our clients expect effective governance and this is crucial for to our success. It ensures appropriate exercise of authority and accountability, provides assurance and identifies opportunities to improve & evolve.

As part of our commitment to informing our employees and stakeholders of modern slavery risks, we commit to undertake regular reviews of our standard procurement agreements and procurement processes to ensure that we have sound governance processes in place to meet our modern slavery compliance. These outcomes include:

- Publication of our Modern Slavery Policy;
- Ensuring that we continue to use the Modern Slavery Supplier Questionnaire issued by the Commonwealth to identify modern slavery risks early in the procurement process;
- Work in partnership with our clients to review of procurement policies and procedures to ensure inclusion of modern slavery clauses; and
- Update our standard procurement agreements to include contractual obligations to address modern slavery compliance, ensuring all new suppliers commit to adherence to the new modern slavery requirements.

Our Risk Profile

WCL Management Services operates in Australia and all employees are in Australia. The risk of the organisation causing, contributing to, or being directly linked to modern slavery practices is highly improbable and realistically minimal acknowledging that WCL Management Services is governed by Australia's high employment standards and statutory safeguards for fair and safe working conditions.

WCL Management Services monitors our organisation to ensure operations are undertaken in a safe environment and workers are treated fairly and in accordance with law and applicable industrial instruments. As part of our commitment towards the safety of our employees and stakeholders, further actions to support our due diligence include verification of prospective employees' age to ensure they meet the minimum age to be eligible for employment; and that all staff are legally eligible to work in Australia. These actions are further integrated into our induction training for new employees which clearly outlines expected workplace behaviour including mandatory work, health and safety training, our contractual and statutory obligations in respect of work, health and safety; and our continuous improvement and investment strategy towards health and safety of all our employees and stakeholders.

Our Outcomes

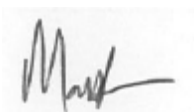
WCL Management Services will continuously identify, assess, manage and improve the elements of our operation that impact on social accountability to remove modern slavery risks and achieve best practice. In accordance with these outcomes we commit to:

- Conduct our business with fairness, honesty, integrity and respect for the interests of our stakeholders;
- Comply with the laws and regulations within the countries in which we operate;
- Prevent the use of child labour and forced labour, improve health and safety, support freedom of association, prevent discrimination, implement performance management and manage compensation and working hours;
- Implement a management system that establishes responsibilities, supporting policies, monitoring methods and a review process of organisational performance;
- Provide awareness training on social accountability and where required, job specific training for employees and stakeholders; and
- Encourage suppliers and contractors to support our principles and commitment on social accountability and introduce programmes aimed at supporting these principles.

Policy Review

This policy is to be displayed prominently at all WCL Management Services' offices. This policy will be communicated to every employee and be available to all other interested parties. In accordance with the WCL Management Services' Documentation Management System, this Policy will be regularly reviewed and updated, with all changes communicated within the organisation in a timely manner.

This policy is approved by the Managing Director in the capacity of a sole-Director, Proprietary Limited organisation.



Matthew Joyce
Managing Director
08 July 2024