



Wilson Group

Modern Slavery statement



1 Introduction

This statement is made by Wilson Parking Australia 1992 Pty Ltd (ABN 67052475911) (**Wilson**), for the year ending 30 June 2020 (**FY20**), on behalf of itself and as responsible entity for:

- Wilson Security Pty Ltd
- Wilson Storage Pty Ltd
- Wilson Health Pty Ltd t/a Wilson Medic One
- InterPark Australia Pty Ltd

The *Modern Slavery Act 2018* (Cth) (**Act**) requires reporting entities to publish a statement setting out the actions they have taken during the financial year to assess and address the risk of modern slavery in their operations and supply chains. This is Wilson's first modern slavery statement and sets out the information required by the Act and describes the risks of modern slavery in our business, our responses to those risk and how we evaluate the effectiveness of our responses.

In FY20, the key areas of focus for Wilson were:

- Preparing our first modern slavery statement;
- Reviewing and updating our existing policies in relation to human rights; and
- Entrenching our human rights commitments in our contracts with new suppliers;

This statement has been approved by the board of Wilson Parking Australia on 25th March 2021.

2 Group Chief Executive Officer's Message

Wilson recognises that safeguarding human rights across our operations and supply chains is an area of great importance to our shareholder, employees, customers and the communities where we operate. Wilson is committed to the fight against modern slavery and recognises that modern slavery is a global concern and that respecting human rights is critical for our capacity as a Group to deliver to our stakeholders.

There is both a moral and a business case for the steps we are taking to identify, report, address and ultimately eliminate any exploitation of vulnerable people with whom we may be involved, directly or indirectly, overseas or at home.

This is Wilson's first modern slavery statement and sets out our commitment, our approach, the steps we have taken and the steps we are taking to identify, assess and address the risks of modern slavery in our Group's operations and supply chains in line with Australia's legislative requirements.

We recognise we are in the early stages of our response and that we still have work to undertake. Further, we recognise that the process of assessing and addressing our exposure to modern slavery risks is not a static process. It requires us to be responsive throughout the process to the opportunities to learn and improve.

We are proud of the initial steps we have taken as a Group in the fight against modern slavery and look forward to updating our stakeholders on our progress in future modern slavery statements.

The disruption caused by COVID-19 presents emerging human rights risks, including increased risks to worker health and safety and modern slavery in key sourcing countries. In response to COVID-19, many governments enforced border closures and restricted internal movement, which has limited the ability of Wilson's internal audit function to initiate audits of suppliers and monitor any remediation of identified breaches.

Ethical sourcing has been a key area of focus for the Group and COVID-19 has highlighted the importance of investing in strong, sustainable supply chains. As the risk of modern slavery increases, the Group's divisions are continuing their focus on managing the unpredictable challenge COVID-19 presents to the Group's supply chains.



3 About Wilson: our structure, operations and supply chains

3.1 About Wilson

Wilson is a privately held, diversified services group in the Asia Pacific with more than 9,000 employees. Wilson’s purpose is to create enduring value through sustainable growth, innovation, and optimisation of its capability as a Group.

Wilson has four core businesses in Australia:

Wilson Parking	Wilson owns car park operations in Australia.
Wilson Security	Wilson provides security solutions for clients of every size and industry across Australia using the latest global trends in security and innovation.
Wilson Storage	Wilson provides a wide range of industry leading storage space solutions and soft logistical support services to its customers across Australia.
Wilson Medic One	Wilson is Australia’s dedicated provider of world-class health service training, industrial and event services and patient transport across Australia.

Wilson is grounded in its core values – **integrity, innovation, customers and leadership**. To that end, Wilson is committed to acting ethically in its operations and supply chains and is dedicated to mitigating the risk of modern slavery in its business and supply chains and the assets in which it invests.

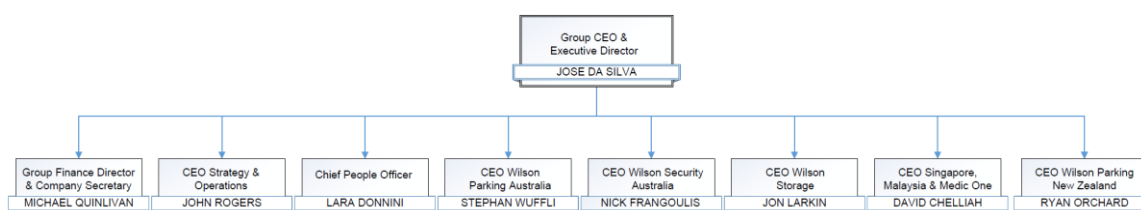
3.2 Our Group Structure

Wilson controls four entities. These are:

- Wilson Parking, WA 6000
- Wilson Security, WA 6000
- Wilson Health, WA 6000
- Wilson Storage, WA 6000

In total, Wilson employs approximately 9,000 employees across all states and territories in Australia.

Set out below is a diagram showing the structure of Wilson’s Executive Leadership Team.





3.3 Our Operations

As noted above, Wilson's operations are centred around its four business units:

1. Wilson Parking
2. Wilson Security
3. Wilson Storage
4. Wilson Medic One

In operating these businesses, Wilson engages in the direct employment of workers.

Wilson Parking

Wilson Parking operates more than 500 car-parking properties across Australia to provide parking services to people across these regions.

Wilson Parking procures the following products and services to support its parking operations:

- Vehicles
- Uniforms
- Labour hire
- Cleaning and maintenance
- Parking access control equipment

Wilson Security

Wilson's security operations involve a team of over 8,000 security, and emergency professionals who work closely with Wilson's clients to tailor security solutions that focus on protecting their operations and assets at all times.

Wilson's security operations rely on the following products and service being procured:

- Vehicles
- Uniforms
- Labour hire
- Security technology and equipment

Wilson Storage

Wilson Storage offers easy to access secure storage units at 11 locations across Victoria and New South Wales.

Wilson Storage sources the following products and services to support its operations:

- Vehicles
- Uniforms
- Cleaning and maintenance



Wilson Medic One

Wilson Medic One has been providing world-class health services and pre-hospital care education for over 8 years.

Wilson Medic One:

- employs over 120 doctors, paramedics, ambulance officers and patient transport officers;
- cares for 20,000 patient transfers a year; and
- ensures 700+ events have the best medical support.

In providing health service training, Wilson Medic One procures the following products and services:

- Vehicles
- Uniforms
- Medical equipment and technology

3.4 Our supply chains

Wilson's supply chains are with various suppliers and specialists from Australia and internationally. Wilson recognises the complexities of its supply chain, encompassing:

- products provided to Wilson by suppliers;
- services provided by suppliers; and
- products and services used by Wilson's indirect suppliers.

As noted above, Wilson's operations are diverse, both in scope and geography. Wilson has begun work in this reporting period to understand its supply chains.

While work has commenced, understanding Wilson's broader supply chain is a complex process. As Wilson enters its next reporting period, it is continuing to further build its understanding of risks among our supplier network through engagement with suppliers and contractors.

Wilson's major suppliers provide products and services that are listed in the table below. These provide long term and stable supply to enable Wilson to achieve its objectives.

Major Source Required	Source Country (where known)
Labour hire	Australia
Vehicles / Fleet Management	Australian distributors with international supply chains
Technology, equipment & supplies	Australian distributors with domestic and international supply chains. Some medical products sourced from China.



Uniforms	Australian based contractors, with potential international supply chains
Corporate services and supplies such as utilities, cleaning, office fit out, consulting & legal services	Australia
Travel Services	Australia

4 Modern slavery risks in operations and supply chain

4.1 Wilson's risk identification process

Wilson is committed to responsible supply chain management and recognises the importance of protecting human rights.

Wilson uses a variety of tools to understand and assess the risk of modern slavery and broader human rights issues in its operations and supply chains. In FY20, these included:

- mapping supply chains;
- undertaking a preliminary risk identification exercise (e.g. based on geographic / industry risk);
- engaging external modern slavery advisors; and
- automated management of our modern slavery obligations

These tools are described in more detail in section **Error! Reference source not found.** below.

4.2 Modern slavery risks

Wilson has identified the residual risk of modern slavery across Group operations as low. The Group's Business Units monitor and address human rights issues in their operations under the Group's Code of Conduct Policy.

Our Australian workforce is covered by either collective agreements or via individual agreements. Agreements confer minimum pay and entitlements and typically provide for consultation regarding significant operational changes. Wilson recognises the right of employees to negotiate collectively, with or without the involvement of third parties.

Other human rights issues that can arise within Wilson operations include equality, fair pay, discrimination and safety. While these are not necessarily indicators of modern slavery risk, the Group acknowledges they are potential labour rights issues.

The safety and wellbeing of our people is Wilson's highest priority and the Group sees the benefits of a relentless focus on providing safe workplaces while acknowledging and taking opportunities to continually improve performance.

4.3 Modern Slavery risks in supply chain

In FY20, Wilson did not identify any instances of modern slavery in its operations or supply chains. However, Wilson has determined that the following goods and services within its operations and supply chains represent a higher risk of modern slavery:



- **labour:** one of Wilson's largest areas of spend is labour. Wilson's labour force is primarily based in Australia and employed directly by Wilson.
- **uniforms:** Wilson procures uniforms, solely from suppliers in Australia. It is recognised that these uniforms are sourced in other countries, and textiles and garments are identified as an area of higher modern slavery risk

Modern slavery risk is heightened in the Group's supply chain by three factors, including:

- **Outsourcing:** There is an increased risk of unfair working conditions for people when the Group's suppliers outsource activities relating to the Group, and that Wilson do not have clear line of site over who is supplying the end product.
- **Labour hire:** There is an increased risk of unfair working conditions for people who are employed by third party labour hire companies. Third party labour hire companies may be contracted to provide security, parking, call centre, and cleaning services, equipment and technology.

Wilson's ability to identify some of its risk areas has been limited due to changes to its suppliers caused by COVID-19. Additionally, Wilson notes that the economic and social impacts of COVID-19 may have increased modern slavery risks in some parts of its operations and supply chains.

5 Our approach to modern slavery

5.1 What has Wilson done to assess and address modern slavery risks?

People are central Wilson's operations. As such, the wellbeing of Wilson's people and the communities in which it operates are a central consideration to the decisions it makes. Consistent with this focus, Wilson is committed to mitigating against any risks of modern slavery within its operations or supply chains.

In this, Wilson's first year of reporting, Wilson has commenced work assessing and addressing its exposure to modern slavery risks. While Wilson is proud of the work done to date, we recognise that this process is its early stages and that the diversity of Wilson's operations complicates this process.

In FY20, Wilson completed a number of initiatives to address risks of modern slavery in its supply chain. These are outlined below.

Preparing Wilson's first modern slavery statement

FY20 is the first year in which Wilson has had to undertake modern slavery reporting. External advice has been obtained on the relevant reporting requirements and Wilson has undertaken a program of works to understand external stakeholder expectations on the level of reporting it provides. This has included reviewing the requirements of any regulations and guidance issued in connection with the Act.

Review of Wilson's human rights policies

Wilson has commenced work reviewing how its commitment to the protection of human rights is reflected in its policies.

Wilson has a comprehensive Human Rights Policy.

The Human Rights Policy sets out:

- Wilson's commitment to the international principles that underpin human rights;
- the principles guiding Wilson's human rights response;
- Wilson's objectives in implementing the Human Rights Policy;
- the way Wilson works in the interest of protecting human rights;
- how Wilson operates to maintain a human rights focus; and
- its accountability framework, including reporting mechanisms.

Wilson's Human Rights Policy was reviewed in December 2020.



The following is a list of other actions that have been taken in the FY20 reporting period to assess and address modern slavery risks:

- Review existing information about the reporting entity's operations and supply chains, such as Human Rights Impact Assessments, Environmental and Social Impact Assessments and WH&S inspections.
- Map key parts of the reporting entity's operations and supply chains to improve its understanding about what is happening within its supply chains. Use this information to undertake a detailed risk assessment, including a process to assess particular suppliers using enhanced checks where necessary.
- Development of tools and policies to monitor high risk suppliers and mitigate associated risks.
- Assign responsibility for assessing and addressing modern slavery risks to a senior manager, develop a modern slavery working group and brief the reporting entity's principal governing body appropriately.
- Set up a mechanism to allow people to safely report modern slavery risks.
- Engage directly with workers and other potentially affected groups in the reporting entity's operations and supply chains, as well as credible experts, to assess risks.
- Review and improve existing policies and procedures, including supplier codes of conduct, sourcing policies and grievance mechanisms.
- Improve staff and management awareness of modern slavery risks through awareness-raising and training.
- Entrenching our human rights commitments in our contracts with new suppliers by updating project and contract template documents to address modern slavery (eg inserting standard modern slavery clauses).
- Take steps to build supportive, transparent and collaborative relationships with suppliers, including encouraging suppliers to be open about modern slavery risks.
- Clearly communicate expectations to suppliers, including by ensuring modern slavery issues are specifically addressed in supplier contracts, prequalification and other relevant mechanisms.
- Automated management of our modern slavery obligations via Lexis Nexis

5.2 Governance

Wilson's commitment to responsible work practices are detailed and underpinned by various internal policies. The policies vary across Wilson's entities, recognising that Wilson's different operations warrant different policy approaches.

Wilson Group

Wilson's attitude is "when in doubt: report it". Wilson encourages all individuals to report any concerns regarding actual or suspected illegal, unethical or unacceptable conduct. This is reflected in Wilson's Speak Up Policy.

Wilson's Speak Up Policy applies to:

- Wilson and all subsidiary and affiliate entities over which it exercises control; and
- all of Wilson's current and former officers, employees, consultants, contractors, suppliers (including employees of suppliers, and associates, as well as these people's relatives and dependants (or dependants of their spouse)).

The Policy has been designed so that investigations of incidents of improper conduct will be treated in a timely manner that is confidential, fair and objective.

Wilson's Speak Up Policy is one of the mechanisms it has implemented through which employees and third parties can report concerns of suspected or actual illegal activity, including in relation to modern slavery. The Policy places pre-eminence on remediation and providing an avenue through which grievances can be reported and addressed.



5.3 Measuring effectiveness

Wilson recognises the need to continually assess the effectiveness of the actions it takes to both assess and address modern slavery risks. Currently, we track the performance through a combination of internal and external mechanisms, and we use these mechanisms to assess the performance of each activity undertaken.

Insights drawn from these measurements inform our current risk management approach and feed into our overall modern slavery commitment. In FY2021, we will continue to assess the practicality of these measurements, identify gaps, and incorporate changes into a broader effectiveness and evaluation framework.

Area	Activity	Measurement
Corporate Governance	<ul style="list-style-type: none">- Board & ELT oversight- Workforce Training on Modern Slavery & Human Rights- Policy Review- Contracts with modern slavery provisions	<ul style="list-style-type: none">- Discussed at Board & ELT meetings- % workers trained- Policy review in line with plan- % of contracts with modern slavery or responsible sourcing commitments
Risk Management	<ul style="list-style-type: none">- Annual risk assessments / risk survey- Supplier onboarding and risk segmentation	<ul style="list-style-type: none">- % risk assessments initiated- Supplier segmentation
Assurance & Monitoring	<ul style="list-style-type: none">- Development of in-house audits- Monitoring of Modern Slavery obligations	<ul style="list-style-type: none">- % audits developed to plan- % modern slavery obligations reviewed
Grievance	<ul style="list-style-type: none">- Business Units capture the number of people who make whistleblower reports- Other channels and mechanisms for grievances to be raised- Cases resolved- Identifying trends from grievance data	<ul style="list-style-type: none">- Total number of whistleblower reports raised- Channels through which issues were raised- Number of cases investigated & resolved- Analysis of investigations.



5.4 Our way forward

Wilson is committed to identifying and remedying modern slavery risks in our supply chains and operations. We have a plan for FY22. Moving into its next modern slavery reporting period, Wilson intends to further assess the effectiveness of its identification and management of modern slavery risks by:

- Regularly reviewing current business practices with respect to Wilson's response to modern slavery and identifying lessons learnt
- Reviewing and improving learning and development courses to include modern slavery training;
- Reviewing and updating procedures and guidelines to help staff take appropriate action where modern slavery risks are suspected or identified, including how to engage with suppliers when a concern or incident is raised;
- Develop a specific action plan for how the reporting entity will improve its response to modern slavery risks and include measurable outcomes and deadlines.
- Build partnerships with business peers, expert civil society groups, local community groups, multi stakeholder bodies and industry bodies to improve the reporting entity's understanding of modern slavery risks.
- Develop a supplier engagement strategy or plan to help target the reporting entity's response by focusing on higher risk suppliers
- Development of Modern Slavery minimum standards
 - Accountability for modern slavery issues, with an identified risk owner
 - Supply chain risk assessment and mapping
 - On-boarding and contracting
 - Audit and compliance program
- Further development of Modern Slavery Self-Assessment Questionnaires (SAQ)
- Modern Slavery Internal Audit Program
- Further implementation of contracts and projects with modern slavery provisions
- Monitor ongoing impacts of COVID-19 on our supply chain prioritising products and services at most risk

In this reporting period, much of Wilson's efforts have been focussed on upskilling and understanding modern slavery and our reporting obligations. However, Wilson emphasises that the effectiveness of our efforts are not and will not be measured by our compliance with the legislative requirements. Effectiveness will not to be measured by the process of reporting, but rather on the effectiveness of the measures Wilson takes to address and assess the risks of modern slavery within its operations and supply chain.

6 Consultations with Wilson entities

Wilson has centralised management and procurement practices and as such, it was not required to extensively consult within the Group in preparing this Modern Slavery Statement. However, Group representatives met with appropriate organisational representatives to frame our expectations, raise awareness and understand their approach in mitigating modern slavery risks.

The Modern Slavery Statement has been circulated to the executive team for comment (including divisional business leads).



7 Appendix

This Statement was prepared to meet the mandatory reporting criteria set out under the Modern Slavery Act.

The table below identifies where each criterion is disclosed within the different sections of the statement.

MSA Criteria	Modern Slavery Statement
Identify the reporting entity	- Section 1 – Introduction (page 1)
Describe the reporting entity's structure, operations and supply chains	- Section 3 - Our structure, operations and supply chains (pages 2-5) - Responding to COVID-19 – Section 2 – CEO Message (page 2)
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or control	- Section 4 - Modern slavery risks in operations and supply chain (pages 5-6)
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	- Section 5 - Our approach to modern slavery (pages 6-10)
Describe how the reporting entity assesses the effectiveness of these actions	- Section 5.3 – Measuring Effectiveness (pages 8-9) - Section 5.4 - Our way forward (page 9)
Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	- Section 6 – Consultation with Wilson Entities (page 10) - Section 5.2 – Governance (pages 7-8)
Provide any other relevant information	- Section 1– Wilson Parking Australia Board Approval of Statement - Section 2 - Group CEO Message (page 1-2)



Signed,

A handwritten signature in black ink, appearing to read 'Jose Da Silva', located below the 'Signed,' text.

Jose Da Silva

Group Chief Executive Officer & Executive Director

25th March 2021