



Modern Slavery statement



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1.1 Introduction

Wilson Group is committed to managing risks of modern slavery and addressing human rights violations within our operations and supply chain. We strive to achieve this in accordance with our corporate values, stakeholder expectations, community expectations and legal requirements.

This statement is made by Wilson Parking Australia 1992 Pty Ltd (ABN 67052475911) (**Wilson**), for the year ending 30 June 2021 (**FY21**), 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

This statement has been prepared in accordance with the *Australian Modern Slavery Act 2018 (Cth)* (**Act**). It describes the risk of modern slavery in our own operations and our supply chains during the period 1st July 2020 – 30th June 2021 (the Reporting Period or FY21), and details the steps Wilson has taken to minimise the risks of modern slavery and the effectiveness of these steps.

In FY21, the key areas of focus for Wilson were:

- Continuing to review our modern slavery obligations;
- 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 1992 Pty Ltd on 31st March 2022.





1.2 Group Chief Executive Officer's Message



Jose Da Silva
GROUP CHIEF EXECUTIVE OFFICER
& EXECUTIVE DIRECTOR

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.

We view our commitment to addressing modern slavery risks as more than just a compliance activity and we know that we have a responsibility to work towards improving and driving positive change across the human rights landscape.

This modern slavery statement 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.

Following the publication of our first Modern Slavery Statement in 2020, we continue to increase our awareness about the potential for modern slavery risks in our industry. We continually review and challenge our internal processes and look to global best practice to ensure we are continuing to strive for the best outcomes for all our stakeholders.

We recognise we continue to be 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.



1.3 Impacts of Covid-19

COVID-19 has changed the risk of modern slavery within our supply chain. COVID-19 continues to present emerging human rights risks, including increased risks to worker health and safety and modern slavery in key sourcing countries. As the risk of modern slavery increases, the Group is continuing our focus on managing the unpredictable challenge COVID-19 presents to the Group's supply chains and where possible, we have taken additional actions to mitigate circumstances which have increased risks.

1.3.1. LABOUR HIRE

Wilson identified an increased risk of labour issues within our Security business due to the rapid and significant uplift in demand across specific industries. This arose as a result of the rapidly changing legal requirements such as the mandatory use of masks, vaccination requirements, and QR check in. During the Reporting Period, Wilson continued to review our major security service suppliers, including wage and subcontracting compliance.

1.3.2. INTERNAL AUDIT

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 some audits of suppliers.

1.3.3. LABOUR SHORTAGE

COVID-19 has significantly impacted the availability of labour in Australia for industries in which we operate. International and domestic border closures, coupled with workers returning to their home countries, resulted in a decline in this source of labour. Reduced labour availability has the potential to increase excessive working hours and use of undocumented labour. In response to these challenges, Wilson has partnered with clients and regulatory authorities to conduct surveys and training on workers focused on worker rights, legislative compliance, and COVID-19 safety measures.

1.3.4. OUR OPERATIONS

Although COVID-19 has presented operational challenges for Wilson, it has not altered our assessment that the risk of modern slavery in our own operations remains low.





1.4 About Wilson: our structure, operations and supply chains

1.4.1. ABOUT WILSON

Wilson is a privately held, diversified services group in the Asia Pacific with more than 10,000 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, patient transport and distribution of disposable health products across Australia.

Wilson is grounded in its core values – *integrity, innovation, customer 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.

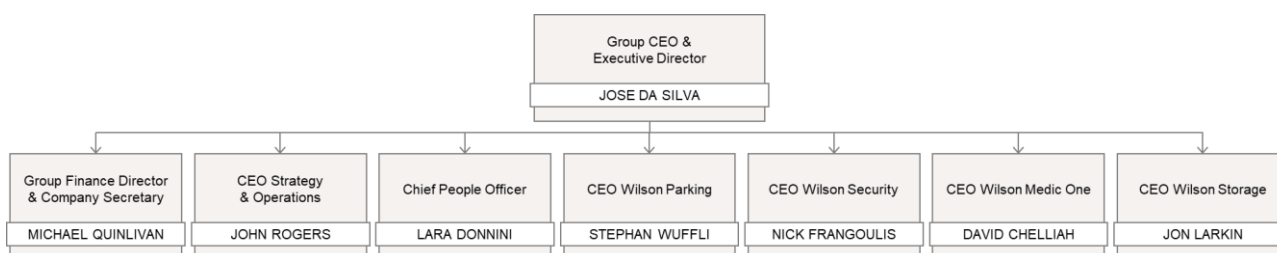
1.4.2. OUR GROUP STRUCTURE

Wilson controls four operating businesses. These are:

- Wilson Parking
- Wilson Security
- Wilson Health
- Wilson Storage

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.





1.4.3. OUR OPERATIONS

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

1. Wilson Parking
2. Wilson Security
3. Wilson Health t/a Wilson Medic One
4. Wilson Storage

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 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;
- ensures 700+ events have the best medical support; and
- distributes disposable health related products.

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

- Vehicles
- Uniforms
- Medical equipment and technology



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:

- Plant, vehicles & forklifts
- Uniforms
- Cleaning and maintenance

1.4.4. 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 better 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 amongst its 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 / Philippines
Vehicles / Fleet Management	Australian distributors with international supply chains
Technology, equipment & supplies	Australian distributors with domestic and international supply chains. Some medical and technology products sourced from Asia.
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



1.5 Our modern slavery risks in operations and supply chain

We recognise that modern slavery risks can occur both in our operations and supply chain given the highly complex and diverse nature of our business

1.5.1. WILSON'S RISK IDENTIFICATION PROCESS

Wilson conduct risk assessments to better understand where potential issues and greater risk may arise and where to prioritise and focus our efforts. These assessments consider not only modern slavery risks, but also broader human rights risks which could indicate a supplier has inadequate controls in place to prevent against modern slavery.

During FY21, Wilson has not identified any instances of modern slavery in its supply chain or own operations.

Wilson continues to use a variety of risk-based tools to understand and assess the risk of modern slavery and broader human rights issues in its operations and supply chains. In FY21, these included:

- continued mapping of supply chains;
- undertaking a preliminary risk identification exercise (e.g. based on geographic / industry risk;

These tools are described in more detail in sections below.

Wilson continue to use intelligence gathered from public sources (including NGO reports and regulatory investigations), insights obtained via our internal grievance mechanisms, discussions across our client and community partnerships, as well as utilising several different tools and databases to help us identify which countries, services, industries and products pose the highest risks. These tools and databases include:

- Lexis Nexis - delivers automated actionable information and applications specifically for modern slavery compliance obligations;
- engaging external modern slavery advisors.

1.5.2. MODERN SLAVERY RISK IN OPERATIONS AND SUPPLY CHAIN

As a business we understand there are risks or indicators which could lead to identifying cases of modern slavery. Wilson has identified the residual risk of modern slavery across Group operations and supply chain as low. A number of risks and indicators have been investigated during the reporting period with no evidence of modern slavery being discovered.

Wilson continue to recognise the following modern slavery risks or indicators as having the greatest potential to exist within our operations and supply chain:

- **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.
- **Medical equipment:** Wilson procures medical equipment, at times from suppliers overseas. It is recognised that medical equipment is often manufactured and sourced in other countries, and medical equipment is identified as an area of higher modern slavery risk.

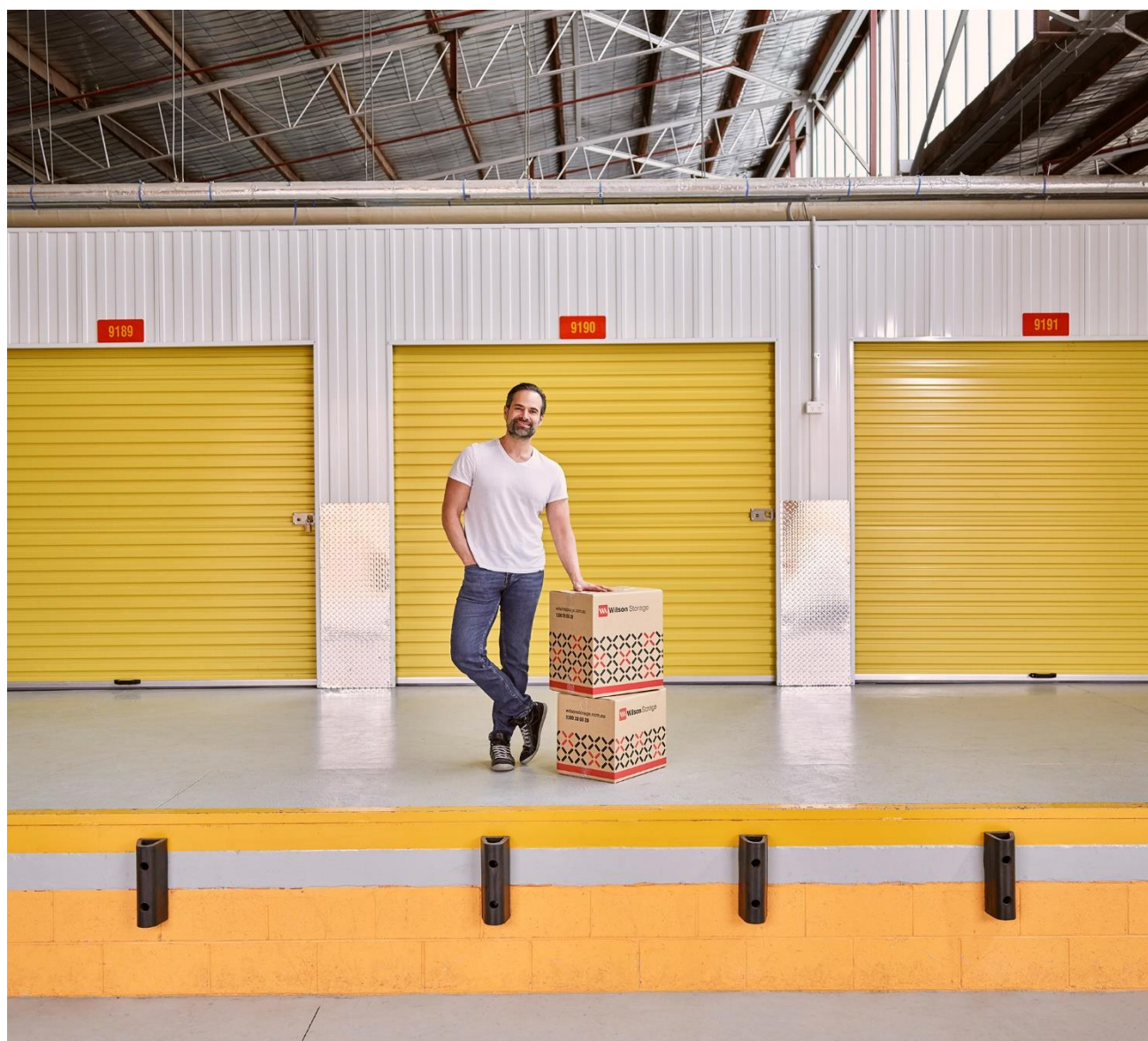
Modern slavery risk is heightened in the Group's supply chain by factors, including:

- **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, cleaning services, equipment and technology.
- **Underpayment of wages and benefits:** There is an increased risk of underpayment of wages, wage theft or withholding wages. The risk of severe underpayment of wages is higher when workers do not fully understand their rights (for example contracts not in the workers' native language, lack of understanding of local laws, highly complex agreements where entitlements are not clear), or where workers are fearful of raising issues (for example undocumented workers). For Wilson, the sectors at highest risk of underpayment are those with a higher proportion of a migrant workforce or where subcontracting or using labour hire.
- **Excessive working hours:** Within Wilson Security two COVID-19 related factors combine to increase the risk of excessive working hours. A surge in demand arising from pandemic control measures combined with increased absenteeism relating to infection control results in the requirement for individuals to work additional hours which requires close scrutiny.

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.





1.6 Actions to assess & address modern slavery risk

People are central to 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 second year of reporting, Wilson continues to assess and address our exposure to modern slavery risks. While Wilson is proud of the work done to date, we recognise that this process is in its early stages and that the diversity of Wilson’s operations complicates this process.

1.6.1. GOVERNANCE

Wilson has established a robust governance structure that oversees the management of modern slavery risks across our own operations and our supply chain. Our Modern Slavery strategy and supporting commitments have been endorsed by the Executive Leadership Team. The governance structure for modern slavery and human rights is outlined below and forms part of our corporate governance framework with key responsibilities and accountabilities:

- Board of Directors
- Executive Leadership Team
- Modern Slavery Working Group

1.6.2. OUR POLICIES

Our policies and procedures play an important role in embedding respect for human rights throughout our business. They identify our values, how we work, and what we expect from our Executive Leadership Team, employees, consultants, contractors, suppliers and business partners working with or for Wilson. They also establish an internal framework that assists us with monitoring compliance with our standards.

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 – Policies that govern our operations

Code of Conduct Policy	Defines how we do business and sets out the standards of behaviour expected from our employees. It emphasises the Group’s commitment to operating ethically and with integrity.
Human Rights Policy	Outlines our commitment to the international principles that underpin human rights and the principles guiding Wilson’s human rights response;
Anti-bribery & Corruption Policy	Outlines our commitment to the highest levels of ethical behaviour, including zero tolerance for bribery and corruption.
Health & Safety Policy	Details our commitment to providing a safe and healthy environment for our employees, customers, suppliers, contractors and visitors.
Speak-up Policy	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.

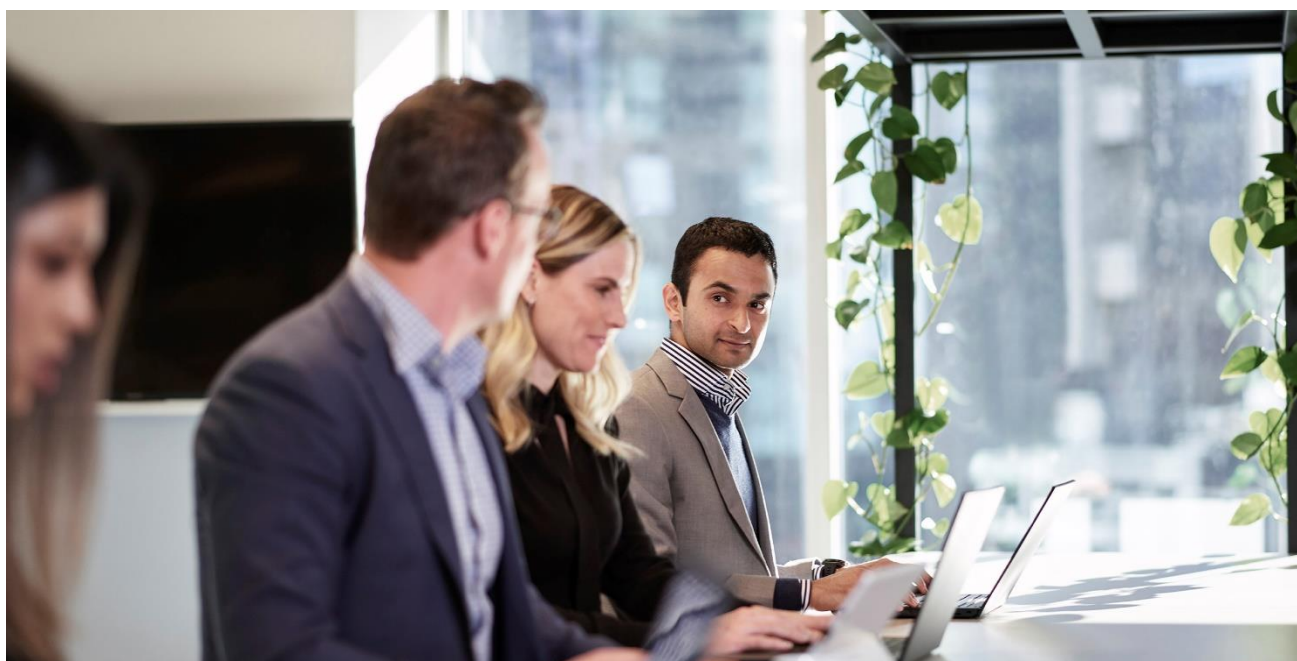


1.6.3. ASSESSING RISK IN OPERATIONS & SUPPLY CHAINS

Wilson is a large business with diverse operations. We operate in some sectors which are at higher risk of modern slavery based on the inherent characteristics of those sectors.

Whilst inherent risk exists, we consider the actual risk of modern slavery in our own operations to be low, based on the following key factors:

- Most Wilson employees are directly employed by Wilson, which means we have direct control of contractual and employment arrangements to ensure they are appropriate and lawful.
- Our governance and compliance controls, comprehensive suite of policies and procedures, coupled with transparent grievance channels and some trade union membership substantially minimise the likelihood of modern slavery.



1.7 Managing our Modern Slavery Risks

Wilson has identified the residual risk of modern slavery across Group operations and supply chain as low. Ongoing management to ensure continued minimisation of these risks includes, but is not limited to:

- The Group's Business Units monitor and address human rights issues in their operations under the Group's Code of Conduct Policy;
- Processes and a Group-wide policy to ensure employees hold working rights in Australia and to ensure compliance with visa conditions where applicable;
- 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.
- Training for team members covering fundamental governance principles, including our Code of Conduct, grievance mechanisms, workplace behaviours and our values;
- Significant resources dedicated to human resource management;
- The safety and wellbeing of our people is our highest priority and the Group sees the benefits of a relentless focus on providing safe and healthy workplaces while acknowledging and taking



opportunities to continually improve performance. The Group continue to have access to dedicated Health, Safety & Wellbeing departments and Chief Medical Advisor to assist with the health, safety and wellbeing of our people;

- Reasonable union membership and engagement;
- Internal assurance activities through an internal audit function;
- Resources, systems and processes to administer employee entitlements;
- Other human rights issues that can arise within Wilson operations include equality, fair pay, and discrimination. While these are not necessarily indicators of modern slavery risk, the Group acknowledges they are potential labour rights issues.
- Preparing Group's modern slavery statement - FY21 is the second year in which Wilson has had to undertake modern slavery reporting. External advice continues to be 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 continued reviewing how our commitment to the protection of human rights is reflected in our policies and procedures. 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.

1.7.1. OTHER INITIATIVES

The following is a list of other actions that have been taken in the FY21 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.
- Mapping key parts of the reporting entity's operations to improve its understanding of the risk within its supply chains. This information is used to target 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, develop a modern slavery working group and brief the reporting entity's principal governing body appropriately.
- Set up enhanced mechanisms 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 and our enterprise risk management framework.



1.8 Assessing the effectiveness of our actions

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 whistle-blower 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.



1.9 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;
- Improving learning and development courses to include modern slavery training;
- Increase learning for suppliers on human rights and the activities Wilson are undertaking to prevent these risks;
- Development of Wilson Modern Slavery Working Group
- Continued review and update of procedures and guidelines to assist 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;
- Maintain the Wilson Group Modern Slavery Action Plan for how Wilson will improve its response to modern slavery risks and include measurable outcomes and deadlines;
- Continue to build partnerships with business peers, expert industry groups, local community groups, multi stakeholder bodies and industry bodies to improve the Group's understanding of modern slavery risks;
- Develop a supplier engagement strategy or plan to help target the Group'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
- Review of Modern Slavery Self-Assessment Questionnaires (SAQ);
- Further implementation of contracts and projects with modern slavery provisions;
- Initiate independent third-party industrial relations audit as part of internal audit framework;
- 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 continued to be 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 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.



1.10 Consultations with Wilson entities

Wilson has centralised management and procurement practices and all Wilson entities operate under a common set of governance policies and programs. This includes the programs through which modern slavery risks in our own operations and our supply chains are assessed and addressed by Wilson.

Group representatives met with appropriate organisational representatives to frame our expectations, raise awareness and understand their approach in mitigating modern slavery risks as part of drafting this modern slavery statement.

Other consultation activities continued throughout the reporting period with Business Units establishing 'Modern Slavery Working Groups. These Working Groups consist of representatives across various functions who met regularly to discuss and align on the disclosures and activities taking place within Business Unit and Group's operations and supply chain which are detailed in this statement.

The Modern Slavery Statement has been circulated to the Executive Leadership Team for comment. The Wilson Group Board have reviewed and approved this statement.





1.11 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	1.1 - Introduction 1.2 - Group Chief Executive Officer's Message
Describe the reporting entity's structure, operations and supply chains	1.4 - About Wilson: Our structure, operations and supply chains
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or control	1.5 - Modern slavery risks in operations and supply chain
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	1.6 - Actions to assess & address modern slavery risk 1.7 - Managing our Modern Slavery Risks
Describe how the reporting entity assesses the effectiveness of these actions	1.8 - Assessing the effectiveness of our actions
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)	1.10 - Consultations with Wilson entities
Provide any other relevant information	1.2 - Group Chief Executive Officer's Message 1.3 - Impacts of COVID-19 1.9 – Our way forward

Signed,

Jose Da Silva

Group Chief Executive Officer & Executive Director

31st March 2022