



Wilson Group

\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 30th June 2024, and as the 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 is our fourth Modern Slavery Statement that has been prepared in accordance with the *Australian Modern Slavery Act 2018 (Cth)* (**Act**). It describes the risk of modern slavery in our operations and our supply chains during the period 1st July 2023 – 30th June 2024 (the Reporting Period) and details the steps Wilson has taken to minimise the risks of modern slavery and the effectiveness of these steps.

For completeness, where our approach to modern slavery, business structure, operations and supply chain have remained the same over the reporting period, we have restated the same information as that laid out in our previous Statements. We have also included references to initiatives undertaken in the previous reporting period for historical context and added any notable progress achieved post FY23, and prior to publishing this Statement for currency.

In FY24, the key areas of focus for Wilson were:

- Ongoing review of our modern slavery obligations;
- Updating and refining our existing policies in relation to human rights;
- Entrenching our human rights commitments in our contracts with new suppliers;
- Strengthening due diligence processes to ensure compliance with anti-modern slavery laws and regulations; and
- Expanding training programs for employees to raise awareness and understanding of modern slavery risks and prevention measures.

This statement has been approved by the board of Wilson Parking Australia 1992 Pty Ltd in October 2024.



1.2 Group Chief Executive Officer's Message



Wilson recognises that human rights and modern slavery pose significant challenges, particularly for vulnerable individuals. Safeguarding human rights across our operations and supply chains is a priority for our shareholders, employees, customers, and the communities we serve. As a Group, we strive to drive meaningful change with a lasting impact, both in our direct operations and across our supply chain as a service provider.

Our focus on combating modern slavery reflects its global significance and our responsibility to uphold human rights as part of delivering value to stakeholders. Guided by ethical responsibility and sound business practices, we prioritize identifying, addressing, and eradicating the exploitation of vulnerable individuals, both domestically and internationally.

Our approach to managing modern slavery risks goes beyond compliance; we aim to foster meaningful change within the broader human rights landscape. This modern slavery statement outlines our strategy and actions to identify, assess, and mitigate these risks within our operations and supply chains, aligning with Australia's legislative requirements.

Since issuing our first Modern Slavery Statement in 2020, we have continually enhanced our understanding of these risks within our industry. We rigorously review and refine our processes, benchmarking against best practices to deliver positive outcomes for all stakeholders. Recognizing that this is an ongoing journey, we remain dedicated to continuous learning, improvement, and proactive risk management to address the complexities of modern slavery.

While we have not identified specific instances of modern slavery, our Modern Slavery Framework remains central to our strategy, guiding our actions across the entire Group. This framework ensures that the fight against modern slavery is integrated into all aspects of our operations, from supplier engagement and risk assessment to employee training and stakeholder communication.

We take pride in the progress we have made as a Group and look forward to updating our stakeholders on future developments in our modern slavery efforts.



1.3 Macroeconomic Impacts on Operations

Global economic challenges such as inflation, rising interest rates, and the increased cost of living are affecting Wilson's operations and supply chains. These pressures have heightened risks, particularly in relation to human rights and modern slavery, as financial stress and job instability increase vulnerability in key sourcing regions. Wilson is actively adapting its approach to mitigate these risks and safeguard both our workforce and supply chain.

1.3.1. EVOLVING LABOUR HIRE & SUPPLY CHAIN RISKS

Economic uncertainty and rising costs of living have altered labour market dynamics, impacting labour availability and heightening risks in certain sectors. Businesses are facing increased pressure to manage rising operational costs while upholding labour standards. Key risks, such as wage underpayment, subcontracting practices, and excessive working hours, have become more pronounced in labour hire arrangements.

Wilson has strengthened its oversight of major service suppliers to address these risks, ensuring compliance with wage laws and worker welfare standards. We have also introduced real-time tracking of working hours and enhanced collaboration with clients and regulatory authorities. This includes ongoing training and surveys to promote workers' rights, legislative compliance, and safety measures, safeguarding against exploitation in the evolving labour market.

1.3.2. ONGOING FOCUS ON HEALTH & WELLBEING

Increased financial pressures on workers and their families have highlighted the need for robust support systems for employee health and wellbeing. Recognising that economic uncertainty can exacerbate mental health challenges, Wilson continues to prioritize initiatives that promote mental, emotional, and physical wellbeing.

Through our partnership with The Resilience Project and the Calm app, we provide employees with practical strategies for building resilience, focusing on gratitude, empathy, mindfulness, and sleep/meditation. Our Wilson Health and Wellbeing Hub also offers resources tailored to support employees' individual needs, helping them manage the effects of the current economic environment. Additionally, we continue to reinforce the availability of our Employee Assistance Program (EAP), offering essential support during challenging times.



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

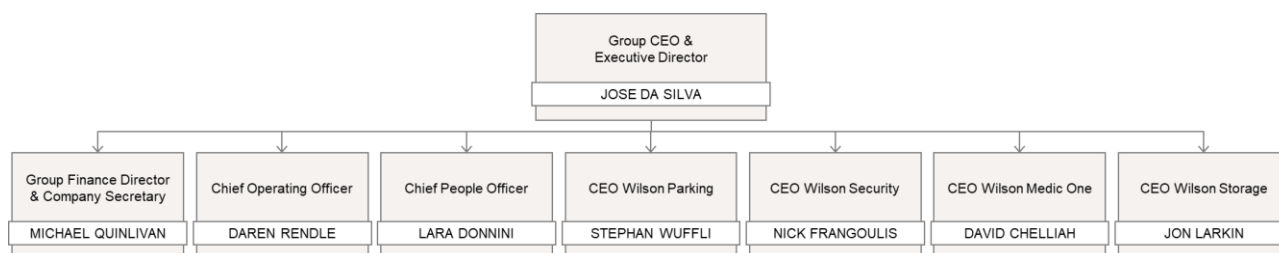
Wilson is grounded in its core values – **Care, Integrity, Accountability & Innovation**. To that end, Wilson is committed to acting ethically in its operations and supply chains and is dedicated to mitigating the risk of modern slavery in its business and supply chains and the assets in which it invests.

1.4.2. OUR GROUP STRUCTURE

Wilson controls four operating businesses. These are:

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

Set out below is a diagram showing the structure of Wilson's Executive Leadership Team during the reporting period.





1.4.3. OUR OPERATIONS

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 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 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
- 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 operates secure storage facilities at 17 locations across Victoria, New South Wales & Tasmania.

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 indirect suppliers.

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

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

1.5 Our modern slavery risks in operations and supply chain

1.5.1. RECOGNISING THE RISKS

Modern slavery encompasses serious human rights violations, including trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruitment practices, and the worst forms of child labour. These practices represent a significant threat to human dignity and rights.

We acknowledge that the risks of modern slavery can manifest within both our operations and supply chains, given the complex and diverse nature of our business. The broader security industry, in particular, has been identified as a sector with elevated risks for modern slavery. Within this industry, modern slavery risks may



include violations of workplace laws, fraudulent subcontracting arrangements, underpayment of wages, and job insecurity.

At Wilson, we have taken the opportunity to lead by example in addressing these risks within a high-risk industry. By adopting and promoting ethical practices, we aim to protect our workforce, support our clients and customers, and safeguard the health and reputation of our business and the broader industry. This commitment not only strengthens our operations but also reinforces our dedication to combating modern slavery in all its forms.

1.5.2. 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 FY24, 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 FY24, these included:

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

These tools are described in more detail in sections below.

Wilson continues 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;
- **EcoVadis** - is a platform that provides sustainability ratings and performance improvement tools for global supply chains, helping Wilson assess the environmental and social performance of suppliers.

1.5.3. 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. This is due partly to the robust safeguards we have implemented and to the decisions we have made about the structure and nature of our businesses.

Wilson continues 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. Additionally, Wilson acknowledges the heightened modern slavery risk associated with Microsourcing in the Philippines, where certain administrative tasks and service delivery functions are outsourced.
- **Uniforms:** Wilson procures uniforms, solely from suppliers in Australia. It is recognised that these uniforms are sourced in other countries, particularly in regions where textile and garments industry 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.



- **Technology Components:** Wilson procures technology, including computers, servers, and IT services, some of which are sourced from regions with known risks of modern slavery in the electronics industry.
- **Technology Devices:** Wilson's technology divisions rely on specialized devices like cameras and security systems, often sourced from global suppliers in regions prone to modern slavery risks.

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 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, the current economic environment and increased cost of living costs may combine to increase the risk of excessive working hours. Additionally, surges in demand due to new contracts and factors like increased violence and aggression and mental health issues may result in the requirement for individuals to work additional hours which requires scrutiny.





1.6 Actions to assess & address modern slavery risk

Wilson acknowledges its pivotal role in adopting a precautionary stance and driving impactful change to safeguard our supply chain and operations against modern slavery practices. The actions undertaken throughout the FY24 reporting period underscore the Group's commitment to ongoing enhancement in our approach to tackling modern slavery risks.

Our workforce remains at the core of our operations, with a firm commitment to prioritising the well-being of our employees and the communities in which we operate. Aligned with this commitment, Wilson is steadfast in its efforts to mitigate any potential risks of modern slavery within both our operations and supply chains.

As Wilson enters its fourth year of reporting, the Group continues its diligent assessment and mitigation of modern slavery risks. While we take pride in the progress achieved so far, we acknowledge that this journey is still in its early stages. Furthermore, the diverse nature of Wilson's operations presents unique challenges that require careful consideration and adaptation.

1.6.1. ASSESSING RISK IN OPERATIONS & SUPPLY CHAINS

Wilson is a large business with diverse operations. We acknowledge that 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 us, granting us direct oversight over contractual and employment arrangements to ensure their appropriateness and legality.
- All employees within our direct workforce are verified to be eligible to work in Australia, with visa applications rigorously vetted by the Department of Home Affairs. This stringent process ensures compliance with legislation and industry best practices, thereby safeguarding the interests of our employees, prospective employees, and other individuals associated with Wilson.
- Our robust governance and compliance framework, supplemented by a comprehensive suite of policies and procedures, along with transparent grievance mechanisms and, in some instances, trade union membership, collectively serve to significantly minimise the likelihood of modern slavery occurrences within our operations.

1.6.2. 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

Our leadership (consisting of our Business Unit Senior Leadership Teams) are committed to delivering multiple levels of support and ongoing monitoring of our on-site personnel.

1.6.3. 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 – Key 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.
Discrimination, Harassment & Bullying Policy & Complaints Procedure	Details the ability to enable all individuals to work in a productive and collaborative environment which allows them to utilise their skills and experience to achieve optimum performance levels and job satisfaction.
Human Rights Policy	Outlines our commitment to the international principles that underpin human rights and the principles guiding Wilson's human rights response;
Fraud, Bribery & Corruption Control 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.
Whistleblower Guide	Internal guide to assist Wilson in dealing with whistleblower disclosures under Australian law.
Right to Work Verification Immigration Guide	Sets out the requirements for verifying working rights for all Wilson Group employees in Australia. This Guide both sets out the requirements, and the roles and responsibilities of all Wilson Group employees in relation to work rights.

In FY24 Wilson has continued to review policies and procedures to ensure that these were consistent and effective in responding to the Act. We are also improving our systems through our SAI Global ISO certified Integrated Management System to ensure the principles of Wilson's Human Rights Policy are faithfully enacted across the business.

1.6.4. MODERN SLAVERY WORKING GROUP

In FY24, Wilson remains steadfast in its commitment to combating modern slavery, with our Modern Slavery Working Group playing a pivotal role in this effort. The Working Group continues to convene quarterly, focusing on reviewing, evaluating, and enhancing our compliance measures. These meetings are crucial in driving ongoing improvements in our operational procedures and supply chain management, ensuring that we address any emerging risks and adapt to the evolving landscape of modern slavery.

The Working Group is composed of key people leaders who bring diverse perspectives and expertise to the table. Their responsibilities include not only the review and revision of our Modern Slavery Framework but also a thorough analysis of its effectiveness. By incorporating lessons learned and addressing challenges encountered, the Working Group ensures that our framework remains robust and responsive to new



developments. This continuous refinement process is essential in maintaining the integrity and impact of our anti-modern slavery efforts.

The Modern Slavery Working Group responsible for the day-to-day implementation and execution of our framework and driving continuous improvement initiatives. This continues to be led by our Group Head of Risk and involve key internal and relevant external stakeholders to progress our approach.

1.6.5. THIRD PARTY MODERN SLAVERY AUDITS OF WILSON

Several of our clients requested Wilson's participation in third-party risk audits focused on our ethical sourcing and modern slavery response. Aspects covered in the audits include governance, policies and practices, recruitment, training, systems and reporting, communications, industrial relations, and supplier management, among other topics.

Wilson will continue to support our clients and actively participate in these audits to ensure transparent and ethical supply chains and welcome any insights and learnings from the process.

Wilson is passionately committed to aligning with and driving industry best practice in responding to Australian modern slavery legislation. We have proven the readiness of our business policies, practices, and systems to assure our workers' rights and safeguard against the risk of labour and human rights abuses.

Recent client audits during FY24 conducted by subject matter experts determined our company has:

- Adequate policies, procedures, and management systems in place to provide employees with relevant entitlements including correct wages, conditions and superannuation, and appropriate record keeping systems.
- Processes to inform employees of their workplace rights, including freedom of association and to raise grievances.
- Adequate WHS systems, policies, and procedures to provide cleaners with a safe work environment.
- Financial viability.
- Adequate onboarding and training procedures.
- Mechanisms in place to reduce the risk of worker exploitation, including sham contracting, underpayment, and forms of modern slavery.

1.6.6. Dexus Case Study – Wilson Security

Safeguarding human rights across our operations, supply chain, and customer base is a priority, exemplified by our strategic service partnership with Dexus.

Since 2018, the Wilson Security / Dexus supplier journey has adopted a collaborative approach to modern slavery risk review, engaging specialist suppliers and actively participating with Dexus' independently appointed advisors from KPMG Modern Slavery, Human Rights, and Social Impact. Through KPMG's comprehensive modern slavery audit program, conducted in 2023, Wilson Security management and staff voluntarily engaged in employee interviews, workshops, a qualitative review, and an internal assessment of our governance measures to date. The goal of this audit was to deepen our shared understanding of the processes and controls necessary to manage and mitigate modern slavery risks effectively, both now and in the future.

KPMG's independent audit highlighted several positive aspects of our current commitments, including our Human Rights Policy, Modern Slavery Statement, an active Modern Slavery Working Group, staff communications and awareness initiatives, and a comprehensive employee training module on our commitment to human rights.

Additionally, KPMG recommended further action, which we have implemented. This includes formal references to human rights and modern slavery within our published Group-wide Wilson Code of Conduct and



Grievance Policies. Moreover, we have strengthened our governance and self-reporting measures through the globally recognised EcoVadis third-party supplier sustainability certification platform.

In close collaboration with our valued partner Dexus, we have prioritised opportunities to learn, identify areas for improvement, raise awareness, and develop innovative solutions for mitigating modern slavery risks.

1.6.7. EcoVadis

EcoVadis is a leading platform that evaluates and rates the sustainability performance of companies across various industries, including efforts to combat modern slavery within their supply chains. Wilson continues to have a Bronze medal recognition from EcoVadis for its commendable efforts in addressing ESG risks.

Through EcoVadis, the Group has demonstrated its commitment to transparency and accountability in supply chain management. The platform assesses the Group's policies, procedures, and practices related to modern slavery, evaluating factors such as supplier engagement, due diligence processes, and mitigation measures.

By leveraging EcoVadis assessment framework, Wilson has not only enhanced its understanding of modern slavery risks but also strengthened its ability to drive positive change throughout its supply chain.

1.6.8. SPEAK UP / WHISTLEBLOWER POLICY

Wilson encourages an open and transparent workplace and a culture of reporting and suspected wrongdoing. We take all reasonable steps to protect those reporting possible human rights or modern slavery incidents. This is formerly communicated in our Human Rights Policy, which is included in onboarding, induction, and employee training.

Wilson continues to establish a third-party anonymous channel for reporting any potential incidents of modern slavery. Face-to-face dialogue and ongoing training are also provided in this regard.

Wilson investigates and address any complaints reported, and internal roles have been assigned to make sure this is done in a consistent and confidential manner.

Wilson can confirm that no concerns were raised in FY24. We are also committed to working closely with law enforcement authorities to respond to any reported modern slavery instances, though to date this has not been required. Our commitment extends to providing ongoing assistance and support to any victims of modern slavery relating to our business if an incident was to arise.

1.7 Managing our Modern Slavery Risks

The ongoing management to ensure the continued minimisation of modern slavery risks within our supply chains and operations is a core focus of our ethical business practices. Our approach includes, but is not limited to, a comprehensive range of proactive and reactive measures designed to uphold human rights, improve transparency, and mitigate potential risks across all levels of our operations. These measures are grounded in our commitment to ongoing improvement, ensuring compliance with modern slavery legislation, and fostering a culture of responsibility and accountability throughout our Group. Key components of this management approach include:

- The Group's business units oversee and manage human rights issues within their operations, following the guidelines set out in the Group's Code of Conduct Policy.
- Group-wide policy and processes to ensure employees hold working rights in Australia and are compliant with visa conditions where applicable.
- Our Australian workforce is covered by either collective agreements, awards, or individual agreements. These instruments 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 to assist with the health, safety, and wellbeing of our people.
- Positive union membership and engagement.
- Internal assurance activities through an internal audit function.
- Resources, systems, and processes to administer employee entitlements.
- 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 via Lexis Nexis.

1.7.1. OTHER INITIATIVES

The following is a list of other actions that have been taken in the FY24 reporting period to assess and address modern slavery risks:

- Integrated modern slavery risks into our enterprise risk register to ensure continuous monitoring.
- Conducted a comprehensive review of our Modern Slavery Self-Assessment Questionnaires (SAQ).
- Enhanced our contractor audit template by adding additional questions related to modern slavery and human rights.
- Continued evaluating existing data on the reporting entity's operations and supply chains through Human Rights Impact Assessments, Environmental and Social Impact Assessments, and WH&S inspections.
- Mapped key areas of Wilson's operations to deepen our understanding of supply chain risks, enabling a targeted risk assessment process, which includes enhanced checks for specific suppliers where required.
- Enhanced tools and policies to monitor high-risk suppliers and mitigate associated modern slavery risks.
- Established improved mechanisms for safely reporting modern slavery risks.
- Engaged directly with workers, affected groups, and credible experts within our operations and supply chains to assess potential risks.
- Reviewed and refined existing policies and procedures, including supplier codes of conduct, sourcing policies, and grievance mechanisms.
- Raised employee and management awareness of modern slavery risks through awareness campaigns and online training modules.
- Embedded our human rights commitments into contracts with new suppliers by updating project and contract templates to include standard modern slavery clauses.
- Fostered transparent, supportive, and collaborative relationships with suppliers, encouraging openness about modern slavery risks.
- Communicated clear expectations to suppliers, ensuring that modern slavery issues are addressed in supplier contracts, prequalification processes, and other relevant mechanisms.
- Enhanced automated management of our modern slavery obligations using Lexis Nexis and integrated this into our enterprise risk management framework.
- Initiated an independent third-party industrial relations audit as part of our internal audit framework.
- Wilson Security has released its inaugural 2023/24 Sustainability Report, a reflection of our ongoing journey towards a more sustainable, safe, and responsible future and in commitment to our core values and principles-involving Environmental, Social, and Governance (ESG) excellence.



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 FY24, we have continued 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 / modern slavery instances	<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.
Modern Slavery Working Group	<ul style="list-style-type: none">- Facilitation of Modern Slavery Working Group	<ul style="list-style-type: none">- Meeting frequency- Modern Slavery / Human Rights framework reviewed.



1.9 Our way forward

Our Modern Slavery Framework continues to guide our organization-wide response to the risks of modern slavery within our business and industry. This framework, along with its supporting processes, is regularly reviewed by our Leadership teams and Modern Slavery Working Group to ensure it remains fit for purpose in an evolving business and regulatory environment.

As we move into the FY2025 reporting period, Wilson Group remains focused on enhancing the effectiveness of its modern slavery risk identification and management practices by:

- Launching a Group-wide FY2024/5 Sustainability Report that will capture modern slavery risks and actions, along with broader ESG efforts, to ensure transparency and accountability.
- Enhancing training and capability-building initiatives on Modern Slavery through multiple channels, such as employee induction programs, online learning modules, face-to-face training, toolbox talks, and internal communication platforms, to build and further improve organizational awareness and action.
- Tailoring our modern slavery training modules to ensure relevance for both leaders and frontline employees, while expanding the reach and effectiveness of these training efforts.
- Increasing educational initiatives for suppliers on modern slavery risks and the actions Wilson Group is taking to prevent them, ensuring a collaborative approach to risk mitigation.
- Strengthening engagement with like-minded organisations, including clients, suppliers, government bodies, and community groups, to broaden our understanding, raise awareness, and develop solutions to mitigate and remediate modern slavery risks across our value chain.
- Conducting a supplier ESG materiality assessment that covers a broad range of ESG topics, including modern slavery and human rights, to better understand supplier risks and improve mitigation strategies.
- Completing third party social audits across its Australian operations, further advancing its efforts to uphold ethical practices and address social risks within its supply chains.
- Expanding the approved supplier register via our Insight platform to better identify high-risk suppliers and ensure they are prequalified based on ethical, health and safety, and environmental standards, while confirming their adherence to our Human Rights Policy and Code of Conduct.
- Strengthening ethical procurement processes to ensure thorough due diligence is undertaken before entering into supplier relationships, with an ongoing review of supplier modern slavery responses as part of continuous monitoring.
- Developing a supplier engagement strategy that focuses on prioritizing higher-risk suppliers, ensuring targeted responses that address modern slavery concerns effectively.
- Continuing to refine procedures and guidelines to assist staff in taking appropriate action when modern slavery risks are identified or suspected, including clear protocols for supplier engagement when concerns or incidents are raised.
- Maintaining and enhancing the Wilson Group Modern Slavery Action Plan, which outlines how Wilson will continue to improve its response to modern slavery risks, with clearly measurable outcomes and timelines.
- Further enhancing our modern slavery audit and compliance program, ensuring it remains robust and responsive to the risks identified.
- Ongoing review of the Modern Slavery / Human Rights Steering Committee to ensure alignment and continuous improvement.

In FY2024, Wilson's efforts will continue to focus on upskilling and building organizational understanding of modern slavery risks and reporting obligations. However, we emphasize that our effectiveness is not measured solely by compliance with legislative requirements. Instead, we will assess our success based on the tangible impact of our actions to identify, manage, and reduce modern slavery risks within our operations and supply chain.



1.10 Consultation 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.

Other consultation activities continued throughout the reporting period with internal and external stakeholders.

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 – Macroeconomic impacts on operations 1.9 – Our way forward

Signed,

Jose Da Silva
Group Chief Executive Officer & Executive Director

October 2024