

WALKER MODERN SLAVERY STATEMENT

For the 2023 Financial Year

Walker supports the *Modern Slavery Act 2018* (Cth) (**Act**) to promote transparency in business supply chains, and to protect the human rights of its employees, customers, tenants and contractors, as well as communities and those within Walker's supply chains.

As at 30 June 2023, Walker Corporation Pty Limited (ACN 001 176 263) as trustee for the L A Walker Family Trust (ABN 92 134 623 291) and Walker Group Holdings Pty Limited (ACN 001 215 069), are identified as reporting entities for the purposes of the Act.

This joint statement is made by Walker Corporation Pty Limited (ACN 001 176 263) as trustee for the L A Walker Family Trust (ABN 92 134 623 291) and Walker Group Holdings Pty Limited (ACN 001 215 069) pursuant to section 14 of the Act, and has been prepared in consultation with all Walker controlled and related entities (together referred to as **Walker**).

As part of developing this statement, Walker Management consulted with its controlled and related entities, raised awareness and identified risks, and discussed the actions it intends to take to address modern slavery risks within the organisation.

1 About Walker

Walker is one of Australia's largest private, diversified property development companies, with over 50 years' experience in the development of over 1000 projects throughout Australia, North America, Fiji and Malaysia.

Walker has expertise across all property sectors, from residential through to master planned communities, retail, commercial, industrial and resort living, with a strong emphasis on the developments being community focused, and incorporating leading edge engineering, technology and ecologically sustainable development practices.

2 Walker's supply chain

2.1 Corporate Operations

Walker's head office is based in Sydney, with a centralised system for procurement and the engagement of services to assist with head office operations, and administering Walker's business.

As at 30 June 2023, Walker's direct and indirect workforce was located in Australia, Malaysia and Fiji, and comprised over 730 employees across business functions including projects, asset management, development, legal, finance and hospitality. Walker's employees are paid a remuneration package which is competitive within the relevant market.

2.2 Development and Projects

Walker engages third parties such as suppliers, advisors and consultants in connection with the development of its assets and large capital expenditure projects. These third parties range across the full development process and include design, construction, planning and project management.

2.3 Asset Management

External service providers are a key part of Walker's supply chain, providing services for the maintenance of our properties and master planned communities. These include the engagement of services such as cleaning, security, maintenance and building services.

2.4 Resort Operations

Walker owns and operates a luxury private island resort in Fiji. The resort is predominantly operated by local employees with a mix of expatriate staff. The operations include, but are not limited to, hospitality services, restaurants, operation of an aircraft hangar, marine fleet, dive centre and more.

3 Risk Identification and Assessment

Walker has implemented an ongoing process of identifying and assessing risk in its operations and supply chains, and has consulted with its controlled and related entities, key stakeholders and the relevant heads of business units in order to identify and assess modern slavery risks in high-risk supply chains for the group, and to develop measures to address those risks.

As at the date of this statement, the following areas of risk have been identified:

3.1 Health & Safety

Health and safety are a high-level risk across Walker's operations, and we have implemented and continue to adhere to a Workplace Health & Safety Policy to address this risk in our direct operations. In addition, we require that all suppliers and their supply chains observe clear workplace health and safety requirements and comply with all applicable laws when working on our projects.

3.2 Sector and industry risks

Walker engages a number of high-risk services as part of its asset management services (eg cleaning and security services). These services have an inherent risk to modern slavery as these positions often have lower wages, involve manual labour and are frequently hired on a casual basis. Workers are also often from migrant, low socio-economic, or culturally or linguistically diverse backgrounds.

Walker also engages a number of contractors within the construction industry. The construction industry has experienced longstanding demand for low-skilled, manual, often migrant labour, which makes it particularly vulnerable to modern slavery practices.

We have sought to address these risks by engaging high quality and reputable suppliers and contractors on terms which require compliance with all modern slavery laws, undertaking an ongoing due diligence process in respect of proposed new suppliers and contractors, and by seeking strengthened provisions in relevant contracts to address modern slavery risks.

3.3 Geographical risk

Geography is a key risk consideration in light of Walker's operations in Fiji and Malaysia, where there are variable regimes, lower labour costs and limited worker rights.

To mitigate against such risks, remuneration for Walker employees in Fiji and Malaysia is in line with local or above market conditions and in compliance with the relevant laws and regulations. We continue to seek increased transparency around labour conditions in our supply chain and through subcontractors to address any modern slavery risks.

4 Key Actions to Address Modern Slavery Risks

Walker is undertaking a number of actions in order to address the risks of modern slavery in its operations and supply chains, including:

- **Awareness training**
Walker has rolled out a modern slavery training program amongst the Executive, Management and relevant staff within the organisation designed to raise awareness and recognition of the various forms of modern slavery. The training will be an annual refresher and targeted from the Executive leadership team through to staff who procure services.
- **Supplier questionnaire**
Walker has rolled out a pre-qualification modern slavery due diligence questionnaire across the business. The questionnaire is required to be completed by certain new suppliers based on a variety of risk factors (including category of spend and industry risks). Responses will be reviewed and monitored to mitigate risks, and ensure modern slavery laws are being complied with.
- **Supplier engagement**
Walker continues to implement and refine its modern slavery framework within existing procurement processes for suppliers of high-risk services. This framework includes communicating with tenderers within high-risk supply chains in regards to Walker's requirements to address the risks of modern slavery and including supplier acceptance of rigorous contractual compliance requirements with respect to modern slavery risks within tender evaluations for high-risk supply chains.
- **Contracts and template clauses**
Walker continues to monitor and refine its requirements for modern slavery contractual conditions in supplier contracts within high risk supply chains.

Supplier contracts require suppliers to comply with all relevant modern slavery laws, and to notify Walker if they become aware that they have engaged, or that any of their subsidiaries, sub-contractors or suppliers have engaged, in modern slavery practices.
- **Corporate policies**
Walker continues to review, revise and apply a number of internal policies to further support its commitment to responsible work practices, such as Walker's Code of Conduct, Modern Slavery Policy, Workplace Health & Safety Policy, Anti-Bribery & Corruption Policy and Whistleblower Policy.

- [Grievance processes](#)

Walker's Code of Conduct confirms the importance of Walker personnel feeling safe, valued and respected in the workplace, and outlines a process for grievances to be raised and resolved. Walker's Whistleblower Policy encourages the reporting of any misconduct or an improper state of affairs or circumstances, including any illegal activity by Walker employees, directors, suppliers or relatives of those individuals.

- [Further assessment of geographical considerations](#)

Walker's operations in Fiji and Malaysia will continue to be monitored closely, with further detailed assessment to be undertaken, and appropriate risk mitigation strategies to be implemented as identified.

5 Measuring effectiveness

We will continue to monitor and assess the effectiveness of our actions taken to address modern slavery risks in our operations and supply chains, as well as developing countermeasures to address those risks.

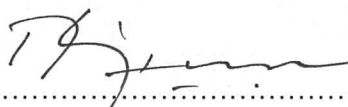
Regular engagement with the Executive, Management, staff, contractors and suppliers is in place to seek feedback and responses from the key actions to address modern slavery risks.

This includes continued engagement with suppliers, examining the due diligence processes for new contractors and suppliers, the refinement of existing policies and the finalisation of further policies, and employee training. In circumstances where we identify or suspect instances of modern slavery in relation to our suppliers, we will try to support our suppliers in rectifying such instances or may follow our grievance procedures.

6 Approval

The Walker Modern Slavery Statement for FY23 has been approved by the boards of Walker Corporation Pty Limited as trustee for the L A Walker Family Trust ABN 92 134 623 291 and Walker Group Holdings Pty Limited ACN 001 215 069.

Signed by a director of Walker Corporation Pty Limited as trustee for L A Walker Family Trust and Walker Group Holdings Pty Limited (and their controlled and related entities) on behalf of those entities:

A handwritten signature in black ink, appearing to be 'D. Callant', written over a dotted line.

Director

The name 'DAVID CALLANT' printed in a simple, uppercase font, positioned below a dotted line.

Print name