



## **Modern Slavery Statement**

This statement, pursuant to the Australian Modern Slavery Act 2018, and the s54(1) of the Modern Slavery Act 2015 (UK) for the period 1 January 2024 to 31 December 2024.

This statement sets out the actions taken by Wellcom Group Pty Ltd (ABN 85 114 312 542) to address modern slavery and human trafficking and has met the requirements for approval.

This statement has been reviewed and approved by the principal governing body, Wellcom Group Ptd Ltd, Board of Directors.

### **1. About Wellcom Group**

Wellcom Group is committed to operating ethically and with integrity in all aspects of our business. We recognise the importance of combating modern slavery and human trafficking, and we are dedicated to ensuring that such practices have no place within our operations or supply chains.

This Modern Slavery Statement outlines the steps we have taken to address these issues in accordance with the Australian Modern Slavery Act and the UK Modern Slavery Act.

### **2. Structure, operations and supply chains**

Wellcom Group operates as a global creative production and marketing technology agency, specialising in digital marketing, omnichannel content production, and marketing operations technology. Our services include video, photography, digital, print and social creative production. Our workforce is made up of art directors, editors, copywriters, retouchers, stylists, photographers, designers, developers, digital strategists and finance professionals.

We operate in Australia, New Zealand, Malaysia, the United Kingdom, and the United States of America and have a diverse network of suppliers and partners globally.

Wellcom's ultimate parent is Innocean Worldwide Inc with Headquarters in South Korea.

Wellcom Group has a global supply chain with relationships in the following sectors: Information, Communications and Technology, Marketing, Print and Promotional Goods, distribution and logistics and professional services providers.

### **3. Risk Assessment and Management**

As a creative production and delivery organisation with a professional workforce, Wellcom considers the risk of modern slavery within our direct business operations to be very low.

Having reassessed Wellcom Group's risk of modern slavery within our internal operations for the 2024 calendar year we have again measured the risk as very low. In reaching this finding we consider the contractual arrangements and employment conditions of those who work for the Wellcom Group.

The Wellcom Group has again assessed the risk of modern slavery in our supply chains as inherently low. This assessment considered the number of contractual agreements in place to support our activities and functions and further noted the nature of our operations and our procurement practices ensure that we do not regularly engage with suppliers considered most at risk.

The annual review of our supply chain has not identified any instances of modern slavery or human trafficking associated directly with our operations. No reports have been received from employees, the public or law enforcement agencies to indicate a breach of our Modern Slavery or Human Rights obligations.

### **Operations and Supply Chain Overview**

Wellcom Group recognises the importance of understanding our supply chain and the risk associated with modern slavery. We have conducted comprehensive mapping to identify areas where modern slavery risks may exist, including but not limited to:

- Direct suppliers: identification and assessment of suppliers providing goods and services directly to the company.
- Indirect suppliers: examination of suppliers further down the supply chain, especially those operating in high-risk industries or geographical regions.
- Internal operations: assessment of our own operations to ensure modern slavery risks are minimised within our company.

## **4. Actions we have taken**

We are committed to upholding human rights and preventing modern slavery in all aspects of our business. In 2024 Wellcom continued to monitor, evaluate, and assess the effectiveness of our actions to ensure that our efforts in combating modern slavery are impactful.

This included:

1. Compliance: We comply with all relevant laws and regulations related to modern slavery and human trafficking, including the Modern Slavery Act (Australia and the UK).
2. Policies: We have developed policies and procedures that prohibit modern slavery and human trafficking in our operations and supply chains. These policies are communicated to all employees and suppliers.
3. Due Diligence: We conduct risk assessments to identify and assess the risk of modern slavery in our operations and supply chains. This includes evaluating our suppliers' practices and implementing measures to address any identified risks.
4. Supplier Engagement: We work closely with our suppliers to promote ethical practices and ensure compliance with our standards. We provide guidance and support to help them improve their labour practices and address any issues related to modern slavery.
5. Training and Awareness: We provide training to our employees and key stakeholders to raise awareness of modern slavery issues and equip them with the knowledge and tools to identify and report any concerns.
6. Incident and response tracking: monitoring reported incidents of potential modern slavery within our supply chains, tracking responses, and analysing outcomes to assess and improve the effectiveness of our preventive measures.

7. Reporting and Transparency: We are committed to transparency and regularly report on our efforts to combat modern slavery in our annual Modern Slavery Statement. We encourage feedback from stakeholders and are continuously seeking ways to improve our approach.

## **Remedial Actions**

Based on the findings of the investigation and risk assessment, appropriate remedial actions will be determined. These actions may include:

- Ceasing business relationships with any suppliers or partners found to be involved in modern slavery or human trafficking.
- Implementing corrective measures to address vulnerabilities or gaps in our policies, procedures, or supply chain practices.
- Providing support and assistance to individuals affected by modern slavery, including access to appropriate services and remedies.
- Collaborating with relevant authorities, law enforcement agencies, and stakeholders to address legal and regulatory requirements and support investigations.

## **5. Effectiveness of our actions**

Since the enactment of the Modern Slavery Acts, we have made significant progress in addressing modern slavery risks within our business and supply chains. Some key achievements include:

- Conducting annual risk assessments across our operations and supply chains.
- Implementing supplier codes of conduct and conducting supplier audits to ensure compliance.
- Providing training to employees and suppliers on modern slavery awareness and prevention.
- Establishing grievance mechanisms for reporting concerns related to modern slavery.
- Engaging with industry associations and initiatives to collaborate on addressing modern slavery risks and concerns.

Wellcom Group is committed to ensuring that as far as possible we address and mitigate any risks of modern slavery in our supply chains. We expect our suppliers to share and adhere to this position. Our standard terms and conditions of contract include compliance with the Australian Modern Slavery Act 2018, Fair Work Act 2009 (Cth) and the Criminal Act 1995 (Cth) and the Modern Slavery Act 2015 (UK).

## **6. Consultation**

Wellcom Group continues our consultation process with our owned or controlled entities including Wellcom New Zealand, UK, US and Malaysia.

The consultation process includes the following:

- Requesting reporting entities complete a self-assessment questionnaire to evaluate how effectively they are managing the risk of modern slavery within their supply chain.
- Meeting with key personnel to support the modern slavery risk assessment.
- Providing guidance on risk levels and potential actions to mitigate identified risks.
- Informing all directors from all entities within the Wellcom Group of Wellcom's responsibilities under the modern slavery legislation and reporting process.

## **7. Additional information**

We recognise that combating modern slavery is an ongoing process that requires continuous improvement and collaboration. In the future, we are committed to:

- Strengthening our due diligence processes to further identify and mitigate modern slavery risks.
- Collaborating with stakeholders, including government agencies, NGOs, and industry peers, to share best practices and drive industry-wide change.
- Continuing to raise awareness and educate our employees, suppliers, and customers on modern slavery issues.
- Regularly reviewing and updating our policies and procedures to ensure they remain effective and aligned with best practices.

## **Conclusion**

Wellcom Group is committed to preventing modern slavery and human trafficking in all aspects of our business. We will continue to work diligently to identify and address risks within our operations and supply chains, and we remain dedicated to upholding human rights and ethical standards. Through our collective efforts, we aim to contribute to a world where modern slavery is eradicated and all individuals are treated with dignity and respect.

This statement, pursuant to s54(1) of the Modern Slavery Act 2015 (UK) and the Australian ModernSlavery Act 2018, for the period 1 January 2024 to 31 December 2024.



**Andrew Lumsden**  
**Chief Executive Officer**  
**Wellcom Worldwide**