

# WGA

## Modern Slavery Statement FY23



WGA



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# From our Joint Managing Directors

WGA (“we”, “our”, “us”) is a multi-disciplinary, award-winning engineering and project management consultancy that operates in Australia and New Zealand.

We understand that Australia is not immune to modern slavery, and recognising the gravity of it, we acknowledge our responsibility to prevent, mitigate and remedy modern slavery in our operations and supply chains. WGA is committed to identifying and managing modern slavery risks within its operations and supply chains.

This voluntary Modern Slavery Statement speaks to the preliminary steps that WGA has implemented in its Modern Slavery Compliance Framework ahead of being a reporting entity pursuant to section 5 of the Act in FY24. In addition to reporting on our current efforts, this statement outlines the steps WGA will take in the next reporting period as we continue to commit and strengthen our Modern Slavery Compliance Framework.



**Ben Stapleton**  
Joint Managing Director



**Nathan Silby**  
Joint Managing Director

On behalf of the Board of WGA Group Holdings Pty Ltd, I am pleased to present WGA’s first Modern Slavery Statement (“**Statement**”) relating to reporting period of 1 July 2022 to 30 June 2023. This voluntary statement pursuant to section 6 of the Act was approved by the board on behalf of the listed reporting entities on October 4th 2023.



**Susan Forrester**  
Chair





### WHAT IS MODERN SLAVERY?

The Walk Free Foundation defines modern slavery as situations of exploitation in which a person cannot refuse or leave because of threats, violence, coercion, deception, or abuse of power. Modern slavery is an umbrella term and includes:

- Human trafficking (as defined in the UN Trafficking in Persons Protocol)
- Debt bondage
- Forced marriage
- Slavery and slavery-like practices (as defined in the Slavery Convention, 1926)
- Forced labour
- The worst forms of child labour (as defined in the Worst Forms of Child Labour Convention, 1999 (No. 182))

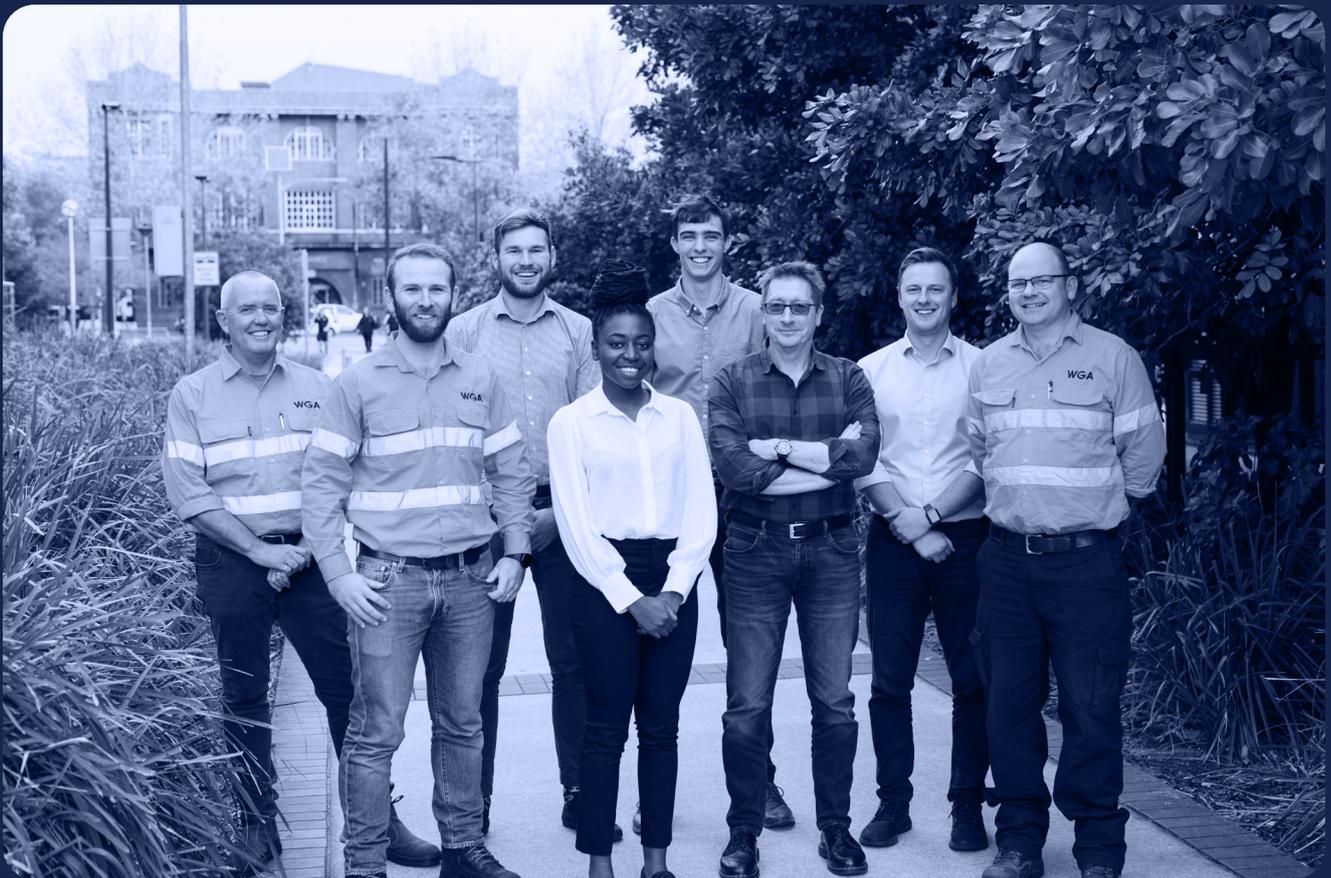
<https://www.walkfree.org/what-is-modern-slavery/>



# Criteria 1— Reporting Entity

The reporting entity is WGA Group Holdings Pty Ltd ABN 86 649 953 980 (“WGAGH”).

This Modern Slavery Statement has been prepared by WGAGH on behalf of the WGA operating entities as described in Criteria 2. Each of these entities has been consulted in the process of preparing this statement which is further outlined in Criteria 6 below.



# Criteria 2— Structure, Operations and Supply Chains

## 2.1 STRUCTURE

This statement has been prepared on behalf of the following “reporting entities” within the WGAGH group.

For the purposes of this statement, WGA’s operating entities are:

- WGASA Pty Ltd - wholly owned subsidiary of WGAGH
- WGAVIC Pty Ltd - wholly owned subsidiary of WGAGH
- WGAWA Pty Ltd - wholly owned subsidiary of WGAGH
- WGAQLD Pty Ltd - wholly owned subsidiary of WGAGH
- WGANSW Pty Ltd - wholly owned subsidiary of WGAGH

- WGA Shared Services Pty Ltd - wholly owned subsidiary of WGAGH
- WGANZ Pty Ltd - wholly owned subsidiary of WGAGH
- Inception Group Pty Ltd - wholly owned subsidiary of WGAGH
- Inception Consulting Engineers Pty Ltd - wholly owned subsidiary of WGAGH

The above entities are collectively referred to as the “Group”.



## 2.2 OUR PEOPLE

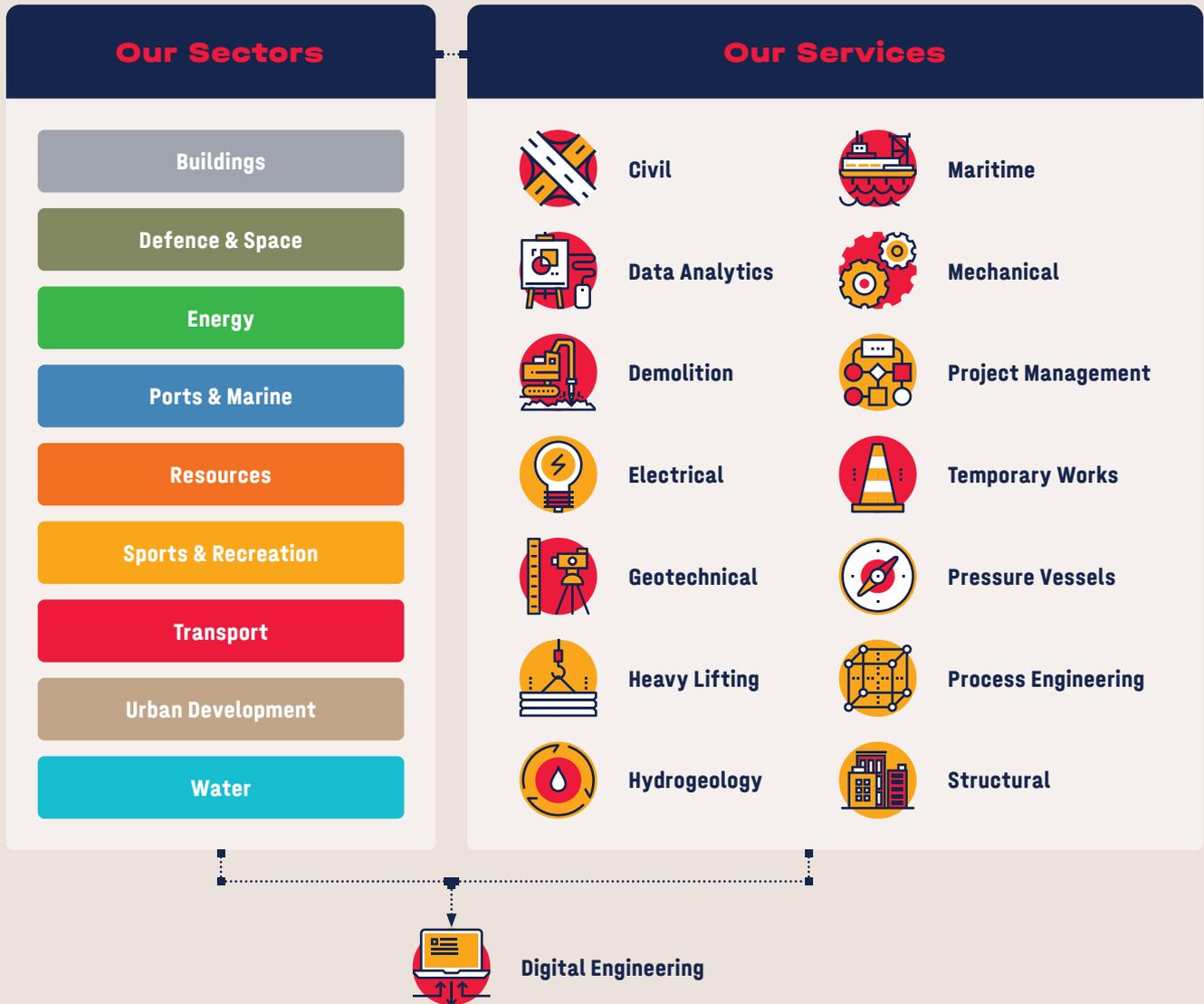


## 2.3 BOARD OF DIRECTORS

Our Board of 10 Directors, consisting of eight Executive Directors and two Non-Executive Directors is responsible for our Group’s corporate governance and our setting business strategy.

## 2.4 OPERATIONS

We provide services in the following market sectors:



## 2.5 SUPPLIER RELATIONSHIPS AND PROCUREMENT

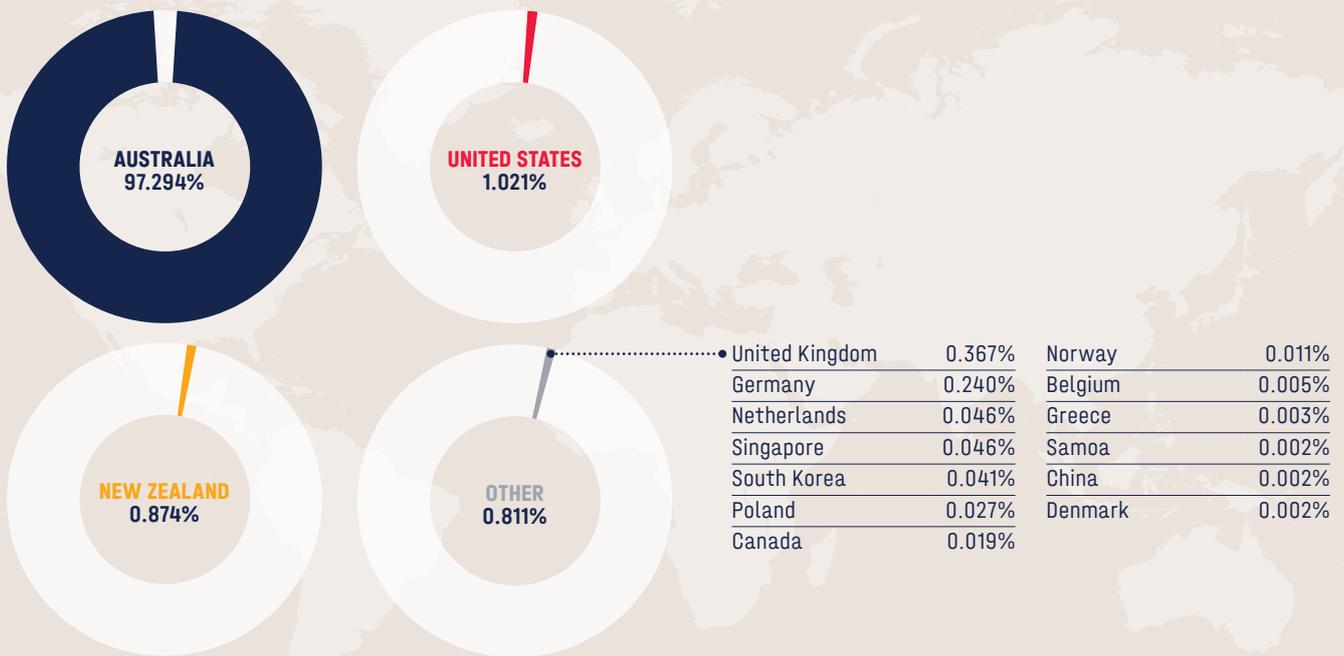
WGA recognise that suppliers are integral to our operations and our ability to provide the highest quality of services to our clients. We believe that our suppliers should share our values and comply with our high ethical, quality, environmental, health and safety standards.

We view our suppliers as partners and consider their alignment with our standards essential. Our expectations of suppliers are outlined in our Supplier Code of Conduct.

WGA predominantly engages with Australian or New Zealand based suppliers in the aim to support local suppliers in our various locations where possible.

## 2.6 SUPPLY CHAINS

To carry out our operations, WGA requires a range of suppliers to provide us with products and services. While most of our Tier 1 Suppliers are based in Australia, some of our suppliers are based internationally.



NB: WGA does not have supply relationships with any countries named on the Global Slavery Index most prevalent list.

Ref [www.walkfree.org/global-slavery-index/](http://www.walkfree.org/global-slavery-index/)

This is our first reporting period; we have yet to delve deeply into our supply chains, that is, beyond Tier 1. Nevertheless, WGA is committed to gaining a greater understanding of our supply chain in future reporting periods.

# Criteria 3— Risks of Modern Slavery

## 3.1 OUR UNDERSTANDING OF RISKS

WGA understands that risks of modern slavery can present in operations and supply chains due to various factors. Modern slavery is a challenging global issue due to the complexity of supply chains in an interconnected world. Many factors must be examined to determine where higher risks of modern slavery may present in our supply chains.

Due to this complexity, WGA developed a risk matrix that considers a wide range of these factors. To determine the risk levels, we have regarded all aspects with the help of our third-party advisers and referred to definitions and ratings listed by the [www.walkfree.org/global-slavery-index](http://www.walkfree.org/global-slavery-index).

### INDUSTRY BASED RISKS

Certain industries carry heightened modern slavery risks due to certain characteristics, products and processes. Some key indicators of modern slavery include the use of child labour, migrant workers and the engagement of labour recruitment agencies.



### PRODUCT AND SERVICES BASED RISKS

Certain products and services have a higher risk of modern slavery due to how they are processed, provided or used. Some indicators of modern slavery include the supplier being significantly cheaper than the market average, excessive working hours (including significant overtime) and short delivery timeframes.



### ENTITY BASED RISKS

Suppliers and other entities that have for example, poor governance structures and/or treat their employees poorly present a higher risk of modern slavery. Indicators of these entity-based risks include poor procurement practices, non-compliance with labour standards and/or human rights and poor site audit results.

WGA approaches the risks associated with modern slavery and assesses risks in accordance with the United Nations Guiding Principles on Business and Human Rights and the ten principles of the UN Global Compact. These principles are considered throughout our risk assessments.



### GEOGRAPHIC BASED RISKS

Suppliers in certain countries present a higher risk of modern slavery than others. Generally, countries with poor socioeconomic status, poor governance, conflict and migration flows present a higher risk of modern slavery.



### “RISK FACTORS” OF MODERN SLAVERY

Whilst the below “risk factors” are not direct evidence of modern slavery, they are risk factors which may indicate broader modern slavery practices within the supplier:

- Significant overtime hours and/or failure to pay overtime rates
- Poor record keeping practices
- Lack of personal protective equipment (PPE)
- Inadequate WH&S practices, exits and signs
- Failure to pay minimum wage or living wage

### 3.2 IDENTIFYING OUR MODERN SLAVERY RISKS

In identifying our modern slavery risks, we consider whether we cause, contribute to, or are directly linked to any modern slavery.

<b>Cause</b>	An entity causes the modern slavery itself via its activities or omissions which results in harm
<b>Contribute To</b>	Activities or omissions by an entity which facilitate, enable or incentivise modern slavery and harm
<b>Directly Linked</b>	An entity being linked to harm through its products, services or business relationships

### OPERATIONS

Our operations are located solely within Australia or New Zealand.

We operate in an industry which is highly regulated and in countries in which the prevalence of modern slavery is considered to be low. In addition to this, WGA’s own operations are compliant by:

- Paying all employees and operates in accordance with the relevant Australian and New Zealand laws and requirements
- Providing avenues for reporting concerns or grievances through various mechanisms, including through our whistleblower mechanism
- Supporting our employees through our employee assistance program
- WGA are introducing a robust training structure for our employees on modern slavery and our Modern Slavery Compliance Framework, which will be largely implemented in FY24

## SUPPLY CHAINS

Like all entities, WGA is not immune to the risks of modern slavery, particularly deeper within our supply chains.

**High-Risk Locations:** Per the Walk Free Foundation’s Global Slavery Index, we understand that countries differ in the prevalence of modern slavery. Suppliers to WGA who employ people from vulnerable populations or who operate in countries or industries where these vulnerable populations are more prevalent are treated as high risk.

**High-Risk Industries:** WGA understands that certain sectors carry higher modern slavery risks due to the type of work being carried out by its employees, as well as industries that are traditionally reliant on migrant workers and temporary workers. We generally consider that any worker on a visa carries heightened vulnerability to fall into modern slavery conditions.

For WGA, the high-risk industries that intersect with high-risk location risks are:

Industry Prevalence		Relevance to WGA and Location Risks	
Excavation, building and construction	Globally, around 18% of modern slavery victims are found in the construction industry. Supply chains associated within this industry can be long and complex and often entities have poor visibility over these supply chains.	WGA engages with subcontractors for investigative/drilling services and other professional services subconsultants. Whilst our Tier 1 suppliers predominately operate in Australia or New Zealand and carry out projects locally, we recognise that there is still an inherent risk associated with this industry.	Whilst 97% of Tier 1 suppliers to WGA are based in Australia <sup>1</sup> , we understand that as we delve more deeply into our supply chain beyond Tier 1 suppliers, we expect the geographical location of suppliers to widen. This will change the risk profile of our supply chains.
Recruitment and labour	One of the biggest modern slavery risks for labour hire and recruitment is the use of third-party labour hire contractors. These third-party labour hire contractors can be unregulated and may not have adequate process in place to inform workers of their rights.	WGA engages transport, hospitality, cleaning and manufacturing suppliers who may use third party labour hire and recruitment providers. Our Tier 1 suppliers predominately operate in Australia or New Zealand, but we understand that the prevalence of Modern Slavery in base-skill labour industries can drastically elevate when combined with high-risk geographical locations.	
Cleaning	The cleaning industry has been identified as a key risk area in Australia. This is largely due to the nature of the workforce who are often unskilled and uneducated, the complexity of the industry itself and the opaque nature of their operations.	WGA’s engages with cleaning companies to maintain its operations. Accordingly, due to the prevalence of these suppliers in our supply chains, this is a high-risk industry for WGA. As per recruitment and labour industry, base-skill labour industries can drastically elevate when combined with high-risk geographical locations.	

<sup>1</sup> Based on Tier 1 supplier scoping of industry and location

## WGA RESPONSE

WGA acknowledges the complexities of addressing modern slavery and achieving compliance with the requirements of the Act.

The actions undertaken in this reporting period are outlined as follows:

# Criteria 4— Actions to address Modern Slavery

This is WGA's first reporting period under the Act. The actions undertaken by WGA in this first reporting period were to establish a framework to enable comprehensive reporting in the future.

To start this process, WGA needed to map and implement core governance and policy structures to oversee its modern slavery compliance moving forward and identify potential key areas of risks in our operations and supply chain. This required a methodical approach and engagement across our organisation.

The actions undertaken in this reporting period are just the beginning of WGA's modern slavery compliance journey. We are committed to implementing the suitable mechanisms to meaningfully identify the risks of modern slavery and develop necessary mitigating actions.

In this reporting period, WGA has implemented a technology solution ("**Portal**") which assists and streamlines WGA's compliance with the Act. The Portal assesses risks in our supply chain that, tracks and records progress, and automates part of our supplier due diligence process. Alongside the implementation of the Portal, WGA has implemented the following:

- Engaging a third party to oversee our Modern Slavery Compliance Framework and reporting
- Developing and implementing a risk matrix to assess our modern slavery risk
- Commenced inserting modern slavery clauses in our supplier contracts
- Establishing a committee to oversee our Modern Slavery Compliance Framework internally
- Mapping, drafting and implementing a modern slavery policy and procedure framework
- Undertaking a scoping exercise of our Tier 1 Suppliers.
- Commencing employee training on modern slavery
- Mapping and implementing a procurement and due diligence workflow for suppliers

The actions undertaken in this reporting period as outlined are the important foundations for further robust actions to be undertaken in future reporting periods.

## 4.1 THIRD PARTY OVERSIGHT FOR MODERN SLAVERY COMPLIANCE AND REPORTING

WGA acknowledges the complexities of addressing modern slavery and achieving compliance with the requirements of the Act. To assist us in forming and developing our Modern Slavery Compliance Framework, we have chosen to engage a third party to provide us with overall guidance. This third party will assist in implementing and devising our modern slavery compliance program.

## 4.2 IMPLEMENTATION OF PORTAL

Through our third-party advisers, we implemented the Portal, a technology platform that serves as the foundation of our Modern Slavery Compliance Framework. The Portal streamlines our framework through automated risk assessments and notifications. This data is gathered and stored on an interactive dashboard, which allows us to communicate directly with our suppliers, have visibility of when a supplier has opened correspondence or started an action item (for example, began a questionnaire) and gives us the ability to produce reports and data analytics to manage our supply chain information. Where any risk is identified, we report and audit this risk and escalate it where required. All of WGA's suppliers will be required to be entered onto the platform, with due diligence forming a mandatory part of supplier engagement going forward.

In this reporting period, WGA have focused on establishing these due diligence processes through the Portal, which will be comprehensively rolled in the next reporting period. Notably, we have issued modern slavery questionnaires to 38 high risk, high priority suppliers which is the start of full implementation of the due diligence processes in the next reporting period.

Through the Portal, all suppliers (existing and new suppliers) will undergo the following due diligence in the next reporting period:



The Portal automatically assesses our suppliers based on the results of the supplier questionnaires issued against our risk matrix (outlined in further detail below). This reviews the suppliers' risk based on a variety of location factors, industry factors and the estimated annual spend on the supplier.

564 of our suppliers have been assessed in accordance with our risk matrix<sup>2</sup> of which:

- 151 (27%) suppliers were considered high risk
- 146 (26%) suppliers were considered moderate risk
- 247 (47%) suppliers were considered as low risk

**STEP 1—  
RISK ASSESSMENT**



All suppliers undergo independent due diligence screenings. The screenings aim to spot for modern slavery risk and broader ESG related risks for a holistic risk assessment. We screen our suppliers against areas including:

- **Integrity Risks** – e.g., bribery and corruption
- **Environmental, Social and Governance Risks** – e.g., environmental degradation, modern slavery
- **Data and Cyber Risks** – e.g., data security
- **Operational and Quality Risks** – e.g., product and service quality
- **Identity Risks** – e.g., transparency risks
- **Financial Risks** – e.g., financial irregularities

**STEP 2—  
SCREENINGS**



The Portal automatically issues and collates supplier questionnaires so that we can ascertain the supplier's current risk profile for modern slavery. Our modern slavery questionnaire is tailored to WGA based on the specific risks in our industry. These questionnaires can be further tailored to the supplier based on their industry and/or individual risk profile.

**STEP 3—  
ISSUING QUESTIONNAIRES**

<sup>2</sup> Risk assessments of suppliers as low, moderate and high risk were made in accordance with our risk matrix and with reference to the Walk Free Foundations Global Slavery Index 2023. Risk profiles will change as due diligence is conducted.

**4.3 MODERN SLAVERY COMPLIANCE COMMITTEE**

To oversee WGA's modern slavery compliance, we established a Modern Slavery Compliance Committee to oversee this process and to report to our board on the progress made in each reporting period.

**4.4 MODERN SLAVERY CONTRACT CLAUSE**

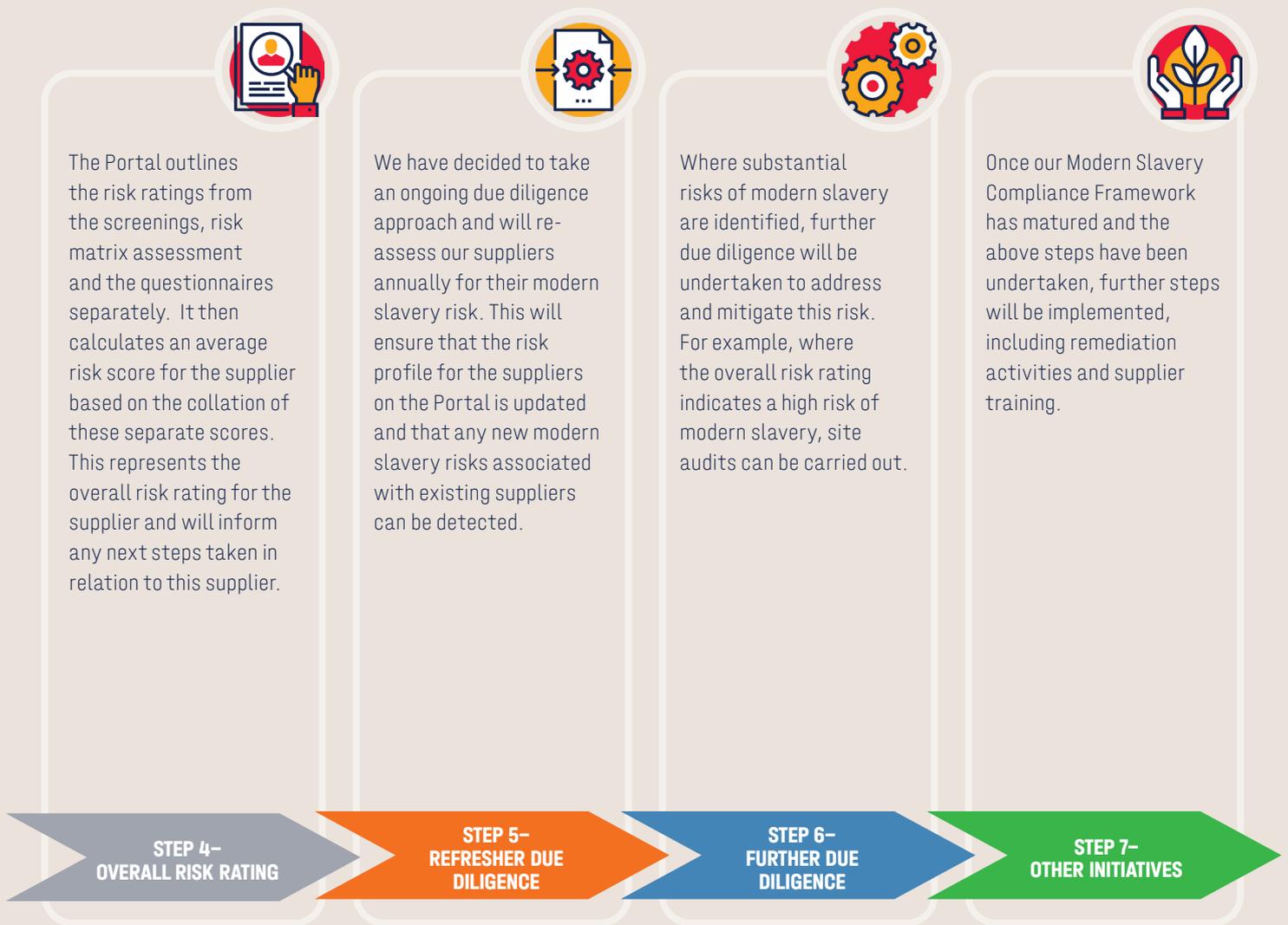
All new supplier arrangements will contain the modern slavery clause in the supplier contract. This means, to work with WGA, suppliers are required to agree to the modern slavery clause being included in the contract.

This clause is in place to outline WGA's expectations concerning modern slavery, which includes, but is not limited to, the contractual requirement for suppliers to report any instances of modern slavery in their operations or supply chains to WGA.

Once the contract has been signed by both parties, the suppliers are bound by the terms of this clause, which gives us the ability to use the contract as a means to enforce our expectations onto our suppliers.

**4.5 MODERN SLAVERY POLICY AND PROCEDURE FRAMEWORK**

In this reporting period, we prioritised implementing a proactive and robust policy and procedure framework. This framework governs the supplier engagement process and sets out our expectations regarding modern slavery to our suppliers clearly and effectively.



The Portal outlines the risk ratings from the screenings, risk matrix assessment and the questionnaires separately. It then calculates an average risk score for the supplier based on the collation of these separate scores. This represents the overall risk rating for the supplier and will inform any next steps taken in relation to this supplier.

We have decided to take an ongoing due diligence approach and will re-assess our suppliers annually for their modern slavery risk. This will ensure that the risk profile for the suppliers on the Portal is updated and that any new modern slavery risks associated with existing suppliers can be detected.

Where substantial risks of modern slavery are identified, further due diligence will be undertaken to address and mitigate this risk. For example, where the overall risk rating indicates a high risk of modern slavery, site audits can be carried out.

Once our Modern Slavery Compliance Framework has matured and the above steps have been undertaken, further steps will be implemented, including remediation activities and supplier training.

**STEP 4—  
OVERALL RISK RATING**

**STEP 5—  
REFRESHER DUE  
DILIGENCE**

**STEP 6—  
FURTHER DUE  
DILIGENCE**

**STEP 7—  
OTHER INITIATIVES**

**SUPPLIER CODE OF CONDUCT AND APPROVED SUPPLIER LIST**

WGA’s Supplier Code of Conduct was implemented as part of WGA’s policy and procedure suite to guide WGA’s Modern Slavery Compliance Framework. The code outlines WGA’s specific expectations surrounding modern slavery, child labour, diversity and equal opportunity and unethical behaviour and corruption.

**MODERN SLAVERY POLICY**

WGA has implemented a Modern Slavery Policy that documents the procedures in place for WGA to comply with the reporting requirements under the Act and undertake due diligence to prevent, mitigate, and where appropriate, remedy modern slavery in WGA’s operations and supply chains.

This policy applies to employees, directors, officers, and other third-party representatives of WGA and therefore binds these parties to the modern slavery policy.

**WHISTLEBLOWER POLICY**

WGA’s Whistleblower Policy outlines what constitutes reportable conduct and the reporting mechanisms that employees can go through to report this reportable conduct. We have referenced our whistleblower policy in our modern slavery policy as a means for reporting any modern slavery instances or concerns.

## Criteria 5— Assessing Effectiveness

As this is WGA's first Modern Slavery Statement, the focus of this reporting period was to develop and implement WGA's Modern Slavery Compliance Framework.

Laying the foundation of a robust Modern Slavery Compliance Framework is critical to ensure that, as an organisation, we can genuinely and meaningfully comply with the Act's reporting and due diligence requirements. Furthermore, this will ensure that in future reporting periods, we have a solid foundation to build upon as our Modern Slavery Compliance Framework continues to expand and mature.

In future reporting periods, as our systems and processes mature, we will be able to assess the effectiveness of the actions implemented in this reporting period. In the next report, we intend to measure the effectiveness of our due diligence of the framework broadly (including our procurement workflow and risk matrix) and our due diligence threshold (i.e., our spend thresholds, classifications of modern slavery risks).

WGA understands that we must continually assess our processes and systems within our Modern Slavery Compliance Framework. We plan to review and audit this framework as we push forward with our commitment to building a business that remains both sustainable and ethical. We aim to continue building on our progress so far and set ambitious goals for the future, including developing an action item plan for the next reporting period.

## Criteria 6— Consultation

As outlined above, this Modern Slavery Statement is prepared by WGAGH on behalf of the Group.

Key teams and people who work across the Group were engaged both throughout the development of our Modern Slavery Compliance Framework and in the drafting of this Modern Slavery Statement, including key managers, procurement, and broader team members in leadership. Accordingly, consultation across our Group was extensive.

Further, key personnel from each of these groups form part of the Modern Slavery Compliance Committee, who meet bi-monthly to discuss and progress matters for the Group. All risk assessing and implementation of initiatives apply across the group.

As previously outlined, WGA engaged our third-party providers to keep us informed about our legislative requirements under the Act. Representatives from our third-party provider consulted with members of our Modern Slavery Compliance Committee regularly throughout the reporting period.

## Criteria 7— Looking Forward

WGA looks forward to continuing to build on the initial steps we have taken in this reporting period to ensure that our Modern Slavery Compliance Framework continues to build, mature and improve over the coming years.

This reporting period prioritised building the foundations of the framework, in particular the Portal and the modern slavery policy and procedure. In the next reporting period, we will review and audit our current framework and develop an action plan (alongside our third party's guidance) for the FY24 reporting period.



# WGA



[WGA.COM.AU](http://WGA.COM.AU)

[WGANZ.CO.NZ](http://WGANZ.CO.NZ)