



7 November 2024

Modern Slavery Statement 2024

This inaugural Modern Slavery Statement (**Statement**) is for Walz Group Pty Ltd (ACN 610 347 076) ("**Walz Group**", "**we**", "**our**" or "**us**") who recorded a consolidated revenue exceeding \$100 million during the reporting period 1 July 2023 to 30 June 2024 (**Reporting Period**). This Statement is prepared for the Reporting Period as required by the *Modern Slavery Act 2018* (Cth) (**the Act**).

1.0 About Walz Group

Walz Group is a Queensland based multidisciplinary integrated business that has been providing specialist maintenance and construction services for over 40 years to the resources, energy and infrastructure sectors. Our corporate office is located in Brisbane, with leased workshop spaces in Gladstone and Mackay, and our operations focus on providing the following services to client owned project sites in Queensland:

- Site installation and erections (SMP);
- Piping fabrication;
- Light, medium and heavy fabrication;
- Maintenance and shutdowns;
- Protective coatings; and
- Water and infrastructure.

We are committed to conducting business in an honest and ethical manner preventing risks of modern slavery in our operations and supply chains. Walz Group is a family owned and operated business with our family origins being a strong part of our culture. Our projects are only as good as our people and we take pride in bringing great teams together to achieve results and attracting team members who are aligned with our values of integrity, respect and long lasting relationships. Our corporate values focus on health and safety, quality outcomes and protecting the environment for future generations throughout our operations.

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Walz Group Pty Ltd (ABN 37 610 347 076)



Modern slavery is a term used to cover a range of exploitative practices, including but not limited to human trafficking, slavery and slavery like practices, child labour and forced labour.

This is the second Modern Slavery Statement submitted by Walz Group addressing the mandatory reporting criteria set out in the Act. This Statement outlines our progress over the Reporting Period in identifying any risks of modern slavery in our operations and supply chains. This Statement also outlines our approach to addressing these risks as well as the actions we have planned to address risks of modern slavery in subsequent reporting periods.

Walz Group are committed to continuously improving transparency within their business and operations. Walz Group do not tolerate any instances of modern slavery, and where the risk of modern slavery practices are identified within Walz Group supply chains, Walz Group will investigate and take appropriate action, including corrective action and changing supply sources as necessary, this is further outlined below.

For further information about Walz Group, please refer to www.walzgroup.biz.

2.0 Our structure, operations, and supply chains

2.1 Structure and operations

This is a joint statement for the Walz Group and the corporate governance, policies, practices, and approach to modern slavery outlined in respect of Walz Group Pty Ltd in this Statement applies equally and is common to the entities within the Walz Group.

The majority of Walz Group's business involves the delivery of contracted services on or to client owned and operated sites. Walz Group's clients include large diversified global miners and our involvement in projects is largely as a contracted provider of services delivered strictly subject to the site specific corporate policies and protocols set by our clients. During the Reporting Period, Walz Group worked on approximately 20 client owned and operated sites delivering contracted services.

Walz Group has also at times delivered contracted services at client owned sites as principal contractor in accordance with Walz Group's own policies and procedures and during the Reporting Period it operated at one site as principal contractor.

Further details in relation to the policies and procedures by which we operate are detailed below at 4.0.

Walz Group's business separately conducts its own workshops at a number of leased premises. As at 30 June 2024, Walz Group leased the following workshop premises:

- Fabrication workshop (Gladstone)
- Blast and paint shop (Gladstone)
- Fabrication workshop (Mackay)

Finally, Walz Group also services a small volume of purchase orders for works that are performed in accordance with the terms of their purchase order only.



2.1.2 Workforce

As at 30 June 2024, Walz Group directly employed 311 employees, broken down into the following categories of employment status:

- Salary Employees – 106
- Wage Employees – 169
- Casual Employees – 29
- Contractors – 7

Of Walz Group's workforce, 18 hold work visas.

Walz Group also has a long-time relationship supporting a local, not for profit apprentice and traineeship company by contracting all of our apprentices through this business. As at the Reporting Period, Walz Group currently has 53 contracted apprentices working across our operations.

As at the end of the Reporting Period, the majority of employees were based in Gladstone.

Walz Group supports employees through our employment policies and procedures which comply with and are audited against Australian laws. All Walz Group employees are issued with an Offer of Employment that complies with Fair Work requirements and has been reviewed by the Australian Industry Group.

The Walz Group Code of Conduct is issued to all employees during their onboarding process along with our Fitness for Work Procedure. The Walz Group Code of Conduct provides a clear and comprehensive standard of behaviour for employees and sets requirements for safe and lawful behaviour and prohibits workplace sexual harassment, bullying and discrimination. Employees are also subject to the Walz Group Whistleblower Policy that defines inappropriate conduct and outlines the process for reporting.

Walz Group employees are also expected to follow the Walz Group Business Conduct and Ethics Policy which guides the behaviour of all members of staff and reinforces the company commitment to behaving honestly and fairly. This policy outlines Walz Group's commitment to open and honest dealings with suppliers and subcontractors which ensures that our high ethical standards is protected and preserved.



We aim to support local communities through our workforce and aim to employ locally wherever possible. We outline our commitment to earning and maintaining the support of our communities in our Business Conduct and Ethics Policy. We believe that building relationships based on trust and mutual understanding with our communities is beneficial to our business.

Walz Group has a long-standing track record of supporting and actively working with the local communities in the areas in which we operate. We provide on ground support to and sponsor a diverse range of local initiatives and community events within our communities. Some of these initiatives are ad hoc in response to requests and many also represent annual contributions over many years now.

A small number of our employees hold Temporary Skill Shortage (subclass 482) visas. These employees have been contracted where it has not been possible to fill a position locally and are subject to the same high employment standards as local employees as per our Enterprise Agreement. Walz Group employs these staff members in compliance with visa requirements.

2.2 Supply chains

Walz Group's supply chain is limited in that the tools and equipment for the contracted services that we provide to clients are generally issued by our clients and therefore form part of the contracting party's supply chain. Walz Group is however responsible for the procurement of goods and services for our workshops, as well as a range of goods and services for the wider business, including:

- Materials for fabrication and paint facilities including steel and pipe;
- Tools, equipment, and vehicles for on site services;
- Safety and environmental management services;
- Uniforms and PPE;
- Corporate and professional services including legal advices, financial services, and insurance; and
- Business services for our corporate office and workshops including cleaning, security, and maintenance.

Walz Group looks for opportunities to support local vendors where possible with our procurement activities and we partner with suppliers from Brisbane, Mackay, or Gladstone wherever possible.

Walz Group work closely with suppliers to ensure the ethical sourcing of goods and services and to ensure accountability in Walz Group's governance and assessing of risk when it comes to Modern Slavery.

3.0 Modern slavery risks

During the Reporting Period, Walz Group took steps to understand our exposure to modern slavery risks with respect to operations. Walz Group acknowledges that the industries we operate in present a variety of modern slavery risks including high-risk on-site activities and complex supply chains. As we participate in the industry as a services provider, we are less exposed to the supply chain activities that pose high modern slavery risks.



As an Australian business provider, we are also legally subject to Australia's high standards for governance, health and safety and legal protections for our employees.

During the Reporting Period, Walz Group did not become aware of any instances of modern slavery in our operations or supply chain. As we refine our approach to modern slavery and commit to annual reporting through a Modern Slavery Statement, we also commit to reviewing modern slavery risks (such as PPE and uniforms) and further engaging with our supply chain partners for transparency to gain greater understanding of where risks lie in our suppliers' operations. We continue to be mindful and aware of any additional modern slavery key risks within our supply chain for future reporting periods.

4.0 Addressing modern slavery risks

4.1 Actions taken by Walz Group within reporting period

During this Reporting Period, Walz Group continued to implement key control measures to identify risks that may cause, contribute to or be directly linked to modern slavery practices, whilst also mitigating and monitoring the key risks identified in Walz Group's global supply chain and operations.

Walz Group is required to meet the modern slavery standards of our contracting parties and most of Walz Group's clients include Modern Slavery clauses in their contracts.

At a minimum, Walz Group is contractually committed to the following actions to address modern slavery risks in accordance with the contract terms set by our clients. During this Reporting Period, Walz Group adhered with such contractual commitments and implemented the following actions in order to strengthen governance and minimize modern slavery risks:

- Compliance with domestic laws around modern slavery (which is deemed to include forced labour, human trafficking, and child labour);
- Taking steps to meet international standards around modern slavery where these set a higher standard than domestic law;
- To the extent practicable, ensuring suppliers and business partners comply with all domestic modern slavery laws;
- Investigating risks of modern slavery within supply chains;
- Notifying contracting party of any confirmed instances of modern slavery and any actions taken to remedy the issues. There were no known instances of modern slavery during this Reporting Period;
- Implementing appropriate due diligence and remediation programs to assess and address modern slavery risks;
- Providing a copy of the Walz Group Modern Slavery Statement to partners upon request once it has been published;
- Including a modern slavery clause in all contracts entered into with secondary subcontractors;
- Taking reasonable steps to ensure there are adequate procedures and policies in place to address modern slavery in line with the UN Guiding Principles on Business and Human Rights; and
- Granting contracting parties access to audit Walz Group in relation to modern slavery practices.



We are advised that our clients consider our position on modern slavery as part of the contractual terms of service.

Walz Group is committed to addressing modern slavery risks in our operations and supply chains beyond the modern slavery clause requirements of contracting parties. Walz Group has focused on prioritising consistency of our workforce and we also mitigate modern slavery labour risks through valuing and retaining our permanent employees rather than relying on labour hire.

The following actions were taken, and policies applied, over the Reporting Period to enable Walz Group to address modern slavery risks.

Whistleblower Policy

Walz Group has a comprehensive Whistleblower Policy in place that defines inappropriate conduct under the policy, outlines the process for reporting on inappropriate conduct, sets out the protections in place for an employee who reports in accordance with this Policy and provides for the investigation process under this Policy. This policy also assists in facilitating confidential and anonymous reporting.

Walz Group regularly communicates this policy to employees through our established communication channels. This Policy reinforces Walz Group's commitment to the highest standards of conduct and ethical behaviour in all business activities.

Anti-bribery and Anti-corruption Policy

Walz Group is committed to responsible corporate governance and honesty and integrity are considered integral to our business values and the way we operate. Walz Group's comprehensive Anti-Bribery and Anti-Corruption Policy upholds this commitment. This policy applies to all Walz Group personnel and prohibits personnel from engaging in activity that constitutes bribery or corruption. The policy sets out the responsibilities of our employees in prohibiting improper conduct and provides information and guidance on how to recognise and deal with instances of bribery and corruption.

Employee health and safety policies

At Walz Group we pride ourselves on the depth of our safety culture and this is embedded through our company's beliefs and values and is reflected in the attitudes of our workforce. Ensuring the well-being of employees, contractors and surrounding communities is a key priority for Walz Group, and our robust leadership, the commitment and accountability of employees, as well as our systems and processes provide the framework to deliver a culture of zero harm.

Walz Group's Health and Safety Policy sets out responsibilities for delivering our objective of zero harm. This Policy requires staff and management to comply with relevant Health and Safety legislation, relevant Codes of Practice, Compliance Codes, Australian Standards and lawful obligations.

Walz Group's commitment to best practice health and safety performance is demonstrated through our certification under the International Organisation for Standardisation (ISO) 45001 Occupational health and safety standard that was awarded during the reporting period. Walz Group's certification under this standard protects employees and contractors from work-related incidents and improves management of health and safety practices to mitigate exposure to risks.



Code of Conduct

Walz Group's Code of Conduct also assists in ensuring appropriate behavior and safety within the workplace, and encourages the reporting of any suspected wrongdoing, unethical or improper conduct resulting in danger and risk within the workplace.

Procurement policies and procedures

Walz Group is committed to enforcing effective systems and controls to prevent exposure to modern slavery risks in our supply chains. This is enabled through our internal governance framework.

Walz Group policies mentioned above are reviewed and updated at least every two years to ensure continuous improvement and the minimisation of modern slavery risks. Policies for Walz Group may be accessed via the Walz internal document management system.

Staff training

Training is provided to Walz Group staff through online induction training and ongoing training for all staff. Staff training at Walz Group is governed by the Training and Competence Document which outlines roles, responsibilities and requirements with respect to training.

Walz Group provides weekly work group toolbox talks rolled out across all sites and regularly runs safety campaigns to equip employees with the latest health and safety information and skills. Walz Group requires any subcontractors to comply with our training procedures.

Contract audits and reviews

Walz Group has a detailed process in place to review the terms of any proposed contracts involving review and negotiation of terms as required with the client or service partner, as well as consultation with relevant stakeholders to address any concerns. Contract reviews are managed by the commercial team with an external legal team engaged for significant contracts and when assistance is identified as required. Contracts are not signed off until a full review has been undertaken.

We review our modern slavery obligations with each of our contracting partners to ensure compliance with contractual requirements.

We undertake internal audits across our business to ensure we are complying with our ISO 9001, ISO 45001 and ISO 14001 certification requirements. The following internal audits were also undertaken during this Reporting Period::

- Paget Operations HSE Systems and Implementation Compliance
- Demountable Buildings Electrical Compliance
- Water Infrastructure Division Skills Assessment
- Powered Plant and Equipment Hazard Analysis Compliance
- Electrical Test and Tag and Fire Systems Inspections Compliance
- Hazardous Chemicals Register Compliance
- SOP-021 Abrasive Blasting
- SOP-118 Surface Protection

- SOP-146 Accident and Incident Reporting
- Managing the Risk of Psychosocial Hazards at Work Code of Practice

4.2 Actions planned to address modern slavery risks in the next reporting period

The following actions are planned to be implemented in subsequent reporting periods to address modern slavery risks:

- Develop and implement a Modern Slavery Policy. Whilst this was included in our previous Modern Slavery Statement, we are in the process of finalising the Modern Slavery Policy which will be implemented in Walz Group's reporting period from 1 July 2024 to 30 June 2025.
- Provide compulsory modern slavery focused training sessions for all Walz Group staff and contractors.
- Introduce and increase the number of supplier audits conducted on all new suppliers and existing suppliers.
- Establish a risk assessment program for Walz Group's suppliers which identifies those suppliers with the highest level of risk of modern slavery based upon their jurisdiction, product being supplied etc.
- Increase awareness of modern slavery risks and practices throughout the workplace.
- Ensure Walz Group only engages with overseas suppliers for specialist items by exception and only when that item cannot be sourced locally.
- Implementation of ongoing supplier screening questionnaires and prioritization of continued relationships with all suppliers and business partners.

5.0 Effectiveness

5.1 Effectiveness of assessment

Walz Group is committed to implementing and enforcing effective systems, controls, and reviews to avoid exposure to modern slavery risks in our operations and in our upstream and downstream value chains. The effectiveness of our business operations is within the scope of regular audits of operations.

We understand in order to continue to assess quantitative and qualitative effectiveness of our actions in addressing modern slavery risks within our supply chain and operations, we need to establish key performance indicators.

Walz Group's effectiveness in addressing modern slavery risks is reflected through our Whistleblower Policy where employees are expected to report on any unsafe work practices, health risks, abuse of authority as well as any breaches of company policies.

In this Reporting Period, there were no whistleblower reports and no complaints relating to modern slavery performance in our operations or within our supply chains.

To date, and in particular during this Reporting Period, the Walz Group have not had any confirmed instances or identified risks of modern slavery.



5.2 Actions planned for assessing effectiveness next reporting period

In the following reporting period from 1 July 2024 to 30 June 2025, Walz Group intends to further enhance capabilities to address modern slavery risks, and further improve methods of assessing the effectiveness of those actions. The following actions have been identified as opportunities for improvement over the next reporting period:

- Introduce mechanisms to track and monitor modern slavery risk and reporting data.
- Exploring additional due diligence mechanisms to be adopted by Walz Group when assessing practices and supply chain risks.
- Update Walz Group supplier terms and conditions to incorporate modern slavery.
- Issuing modern slavery questionnaires/surveys to direct suppliers to further assess modern slavery risks in the supply chain.
- Introduce modern slavery training into mandatory staff training programs.

6.0 Process of consultation

Consultation for the purposes of this statement has been undertaken by Walz Group, and reviews have been conducted by our commercial team.

Modern slavery compliance will be addressed and managed by the Walz Commercial Manager and Walz CEO.

This statement has been reviewed by Walz Group Pty Ltd's Board of Directors.

7.0 Approval

This statement has been approved by the Board of Walz Group Pty Ltd, the signatory is a Director and responsible member of Walz Group and is authorised to sign this modern slavery statement by the Board of Directors of Walz Group.

A handwritten signature in black ink, appearing to read 'Matthew Campiutti'.

Signed by Matthew Campiutti
Director
Walz Group Pty Ltd