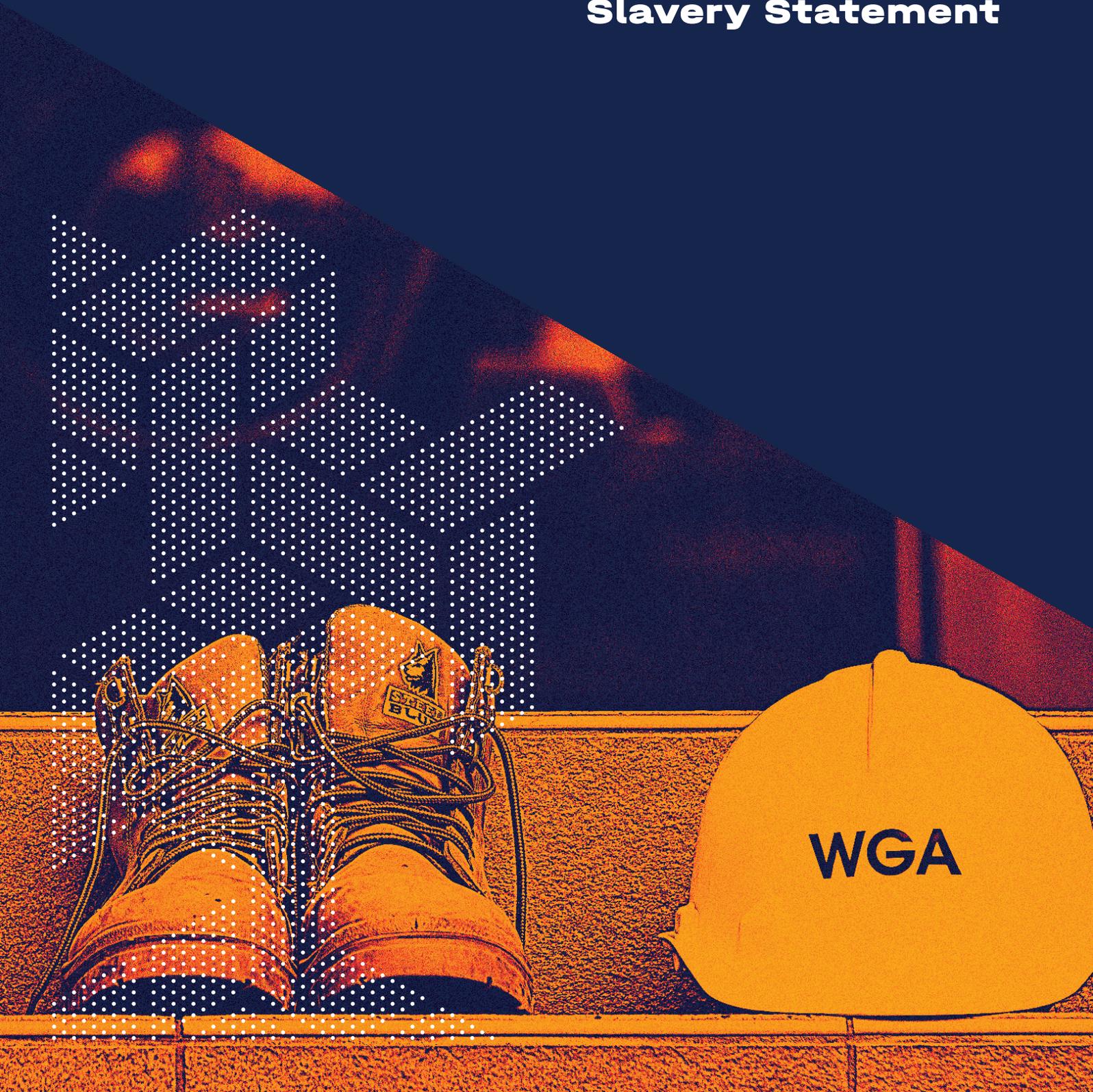


# WGA

## FY25 Modern Slavery Statement



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# From our Joint Managing Directors

At WGA, (“we”, “us”, “our”) we are guided by a strong commitment to create a better world through our work and actions. A key part of this commitment is our ongoing dedication to identify, prevent, and address modern slavery risks within our operations and supply chains.

Over the past year, we have focused on strengthening our compliance framework. This included adopting a risk-based approach to supplier due diligence and expanding our visibility into our Tier 2 suppliers.

**It’s not just the outcome; it’s the journey to get there.**

We recognise that addressing modern slavery is a continuous journey. Each year brings new opportunities to strengthen our approach, deepen our understanding, and refine our practices.

This Modern Slavery Statement (“Statement”) outlines the actions we undertook during the FY25 reporting period, and sets out our future focus areas to further strengthen our compliance framework as well as monitor any proposed amendments to the Modern Slavery Act 2018 (Cth) (“Act”), arising out of the 2023 statutory review.



**Nathan Silby**  
Joint Managing Director



**Ben Stapleton**  
Joint Managing Director



### BOARD APPROVAL

On behalf of the Board of WGA Group Holdings Pty Ltd, I am pleased to present WGA’s second statement as a reporting entity under the Act, relating to the reporting period of 1 July 2024 to 30 June 2025.

This statement, pursuant to section 13 of the Act was approved by the Board on 3 December 2025.



**Susan Forrester AM**  
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))

**WGA’s Commitment to Modern Slavery**  
We have a zero-tolerance approach to any instances of modern slavery in our operations and supply chains and actively support our suppliers to develop their awareness of the risks.

## 1—Who we are

Founded in 1982, WGA is a multi-disciplinary, award-winning engineering and project management consultancy operating in Australia and New Zealand.

Additionally, we pride ourselves on continuously adding value to our customers by providing streamlined access to a broad range of integrated services.

We are committed to upholding high ethical standards within our operations and in the operations of those we do business with.

### REPORTING ENTITY

The reporting entity for this Statement is WGA Group Holdings Pty Ltd ABN 86 649 953 980 (“WGAGH”). The included entities in this statement are the WGA operating entities as described in Criteria 2 of this statement. This statement is for the reporting period of 1 July 2024 to 30 June 2025.

Our work is guided by our values and our vision to develop long-term and collaborative relationships with our customers, suppliers and our community more broadly.

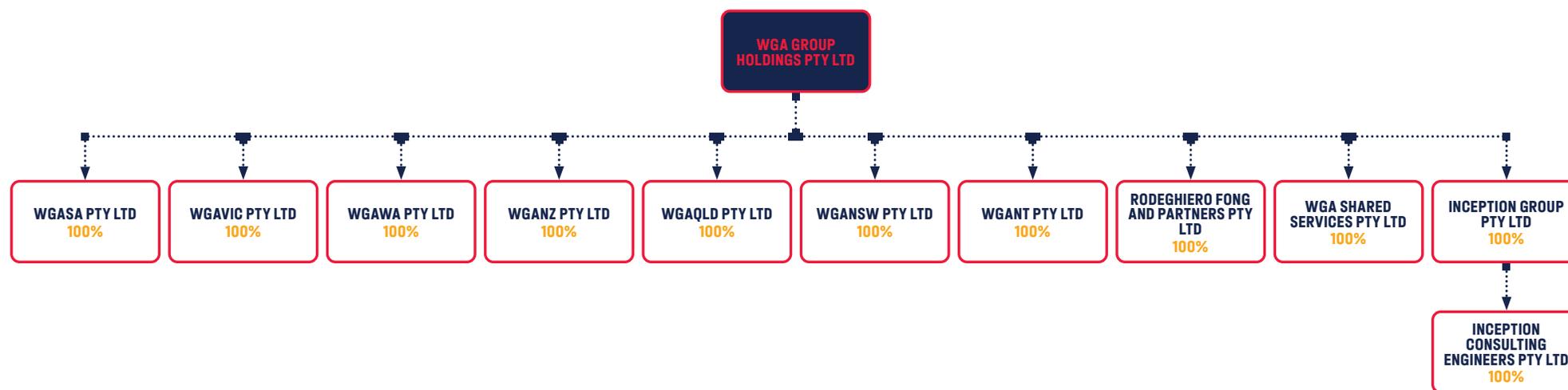


# 2—Structure, Operations and Supply Chains

## 2.1 STRUCTURE

The WGA Group of Companies (“WGA Group”) comprises of the following wholly owned subsidiary entities to WGAGH:

- WGASA Pty Ltd
- WGAVIC Pty Ltd
- WGAWA Pty Ltd
- WGANZ Pty Ltd
- WGAQLD Pty Ltd
- WGANSW Pty Ltd
- WGANT Pty Ltd
- Rodeghiero Fong & Partners Pty Ltd
- WGA Shared Services Pty Ltd
- Inception Group Pty Ltd
- Inception Consulting Engineers Pty Ltd



This statement has been prepared by WGA Group Holdings Pty Ltd, with each of the WGA Group entities being consulted in the process of preparing this statement.

Our WGA Group is managed from our registered office at 60 Wyatt Street, Adelaide SA 5000.

## 2.2 GOVERNANCE

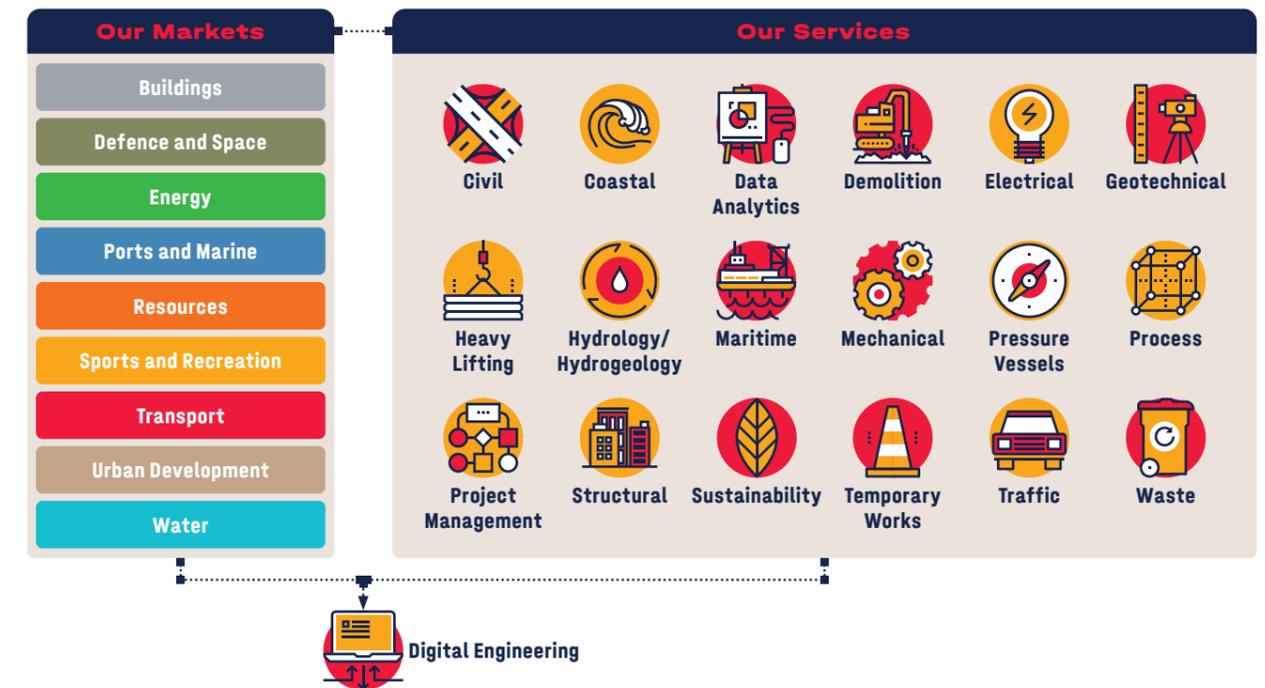
<b>WGAGH BOARD ("BOARD")</b>	Our Board consists of eight Directors; six Executive Directors and two Non-Executive Directors. The primary role of the Board is to provide strategic oversight and leadership, ensuring effective governance, management and business performance aligned with the Board-approved strategy.
<b>BOARD SUB-COMMITTEES</b> <ul style="list-style-type: none"> <li>Board Risk and Opportunity Committee ("BROC")</li> <li>People and Culture Committee ("PCC")</li> <li>Environmental, Social, Governance Committee ("ESGC")</li> </ul>	Our three Board Sub-Committees provide focused strategic guidance and recommendations to the Board relating to their area of expertise: <ul style="list-style-type: none"> <li><b>BROC</b> – Oversees risk management and identifies strategic opportunities.</li> <li><b>PCC</b> – Focuses on workforce strategy, leadership, and organisational culture.</li> <li><b>ESGC</b> – Guides the Board on governance practices relating to environmental sustainability and social responsibility.</li> </ul>
<b>EXECUTIVE LEADERSHIP TEAM ("ELT")</b>	Our ELT comprises leaders from key functions and locations across WGA. They are responsible for the day-to-day management of the business, including people, client service, quality, and financial performance.
<b>MODERN SLAVERY COMPLIANCE COMMITTEE ("MSCC")</b>	<p>The MSCC works closely with our Approved Suppliers Team to identify and manage modern slavery risks through compliance and due diligence.</p> <p>Key responsibilities include:</p> <ul style="list-style-type: none"> <li>Promoting continuous improvement and building a strong risk-aware culture that reflects our core values.</li> <li>Using a risk-based approach to assess suppliers based on location, industry, and type of service.</li> <li>Investigating any negative findings from due diligence checks.</li> <li>Responding to reports of suspected modern slavery. If a case arises, the MSCC will work with relevant stakeholders to investigate, reduce harm, and prevent future incidents; always using a victim-centred approach guided by the UN's principles.</li> </ul> <p>The MSCC regularly seeks feedback and reports on goal progress to the ESGC.</p>
<b>APPROVED SUPPLIERS TEAM</b>	<p>Our Approved Suppliers Team plays a critical role in ensuring that WGA engages with suppliers who meet our standards for ethical conduct, quality, and compliance.</p> <p>This includes administering our supplier vetting and onboarding process and maintaining the Approved Suppliers register.</p>

## 2.3 OUR PEOPLE



## 2.4 OPERATIONS

We provide services in the following market sectors:



### MAKING A DIFFERENCE

We aspire to be the change that the world needs. We want to be known as the people whose work leads to a better world.

We have already made some significant strides in this journey, and we are eager to achieve more.

## 2.5 SUPPLIER RELATIONSHIPS AND PROCUREMENT

WGA recognises that suppliers are integral to our operations and our ability to provide the highest quality of services to our clients.

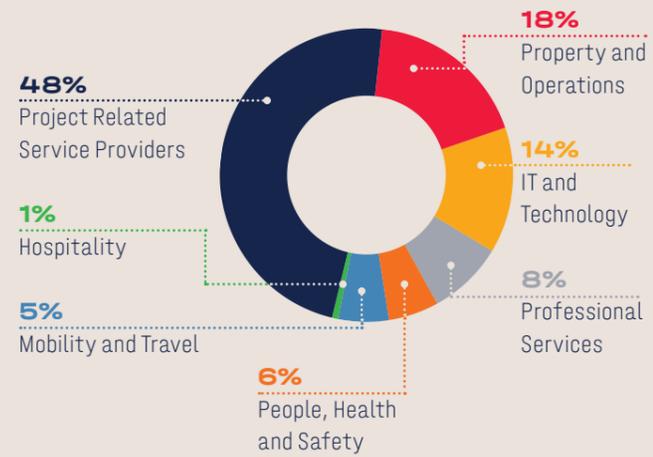
We believe that our suppliers should share our values and comply with our high ethical, quality, environmental, health and safety standards. We view our suppliers as partners and consider their alignment with our standards essential.

Our Supplier Code of Conduct outlines our expectations of our suppliers. Furthermore, during the reporting period, WGA have progressed towards implementing an ESG Procurement Guide, which outlines how WGA considers environmental, social and governance-related business risks and opportunities through its procurement decisions. More details around WGA's policy and procedure framework surrounding modern slavery, ESG and procurement are outlined in Criteria 4 below.

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

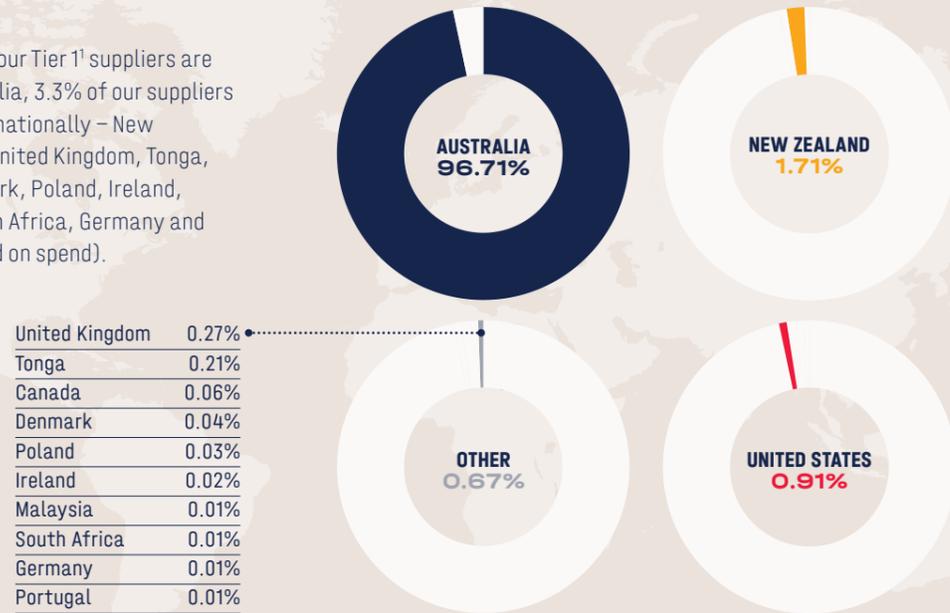
## 2.6 SUPPLY CHAINS

To carry out our operations, WGA requires a range of suppliers to provide us with products and services. The major categories of procurement include:



### TIER 1

Whilst most of our Tier 1 suppliers are based in Australia, 3.3% of our suppliers are based internationally – New Zealand, USA, United Kingdom, Tonga, Canada, Denmark, Poland, Ireland, Malaysia, South Africa, Germany and Portugal (based on spend).



### TIER 2

Over the last two reporting periods, supply chain tracing exercises have helped us identify the locations of some Tier 2<sup>2</sup> suppliers. Although this represents a relatively small subset, the findings show:

- **Australia:** 86.6%
- **Other countries (13.4% combined):**
  - New Zealand: 3.83%
  - USA: 2.39%
  - China: 1.91%
  - Malaysia: 0.96%
  - UK: 0.96%
  - Denmark: 0.48%
  - France: 0.48%
  - Germany: 0.48%
  - Indonesia: 0.48%
  - Japan: 0.48%
  - South Africa: 0.48%
  - South Korea: 0.48%

<sup>1</sup> "Tier 1 suppliers" are the suppliers that WGA directly engages and has contractual relationships with.

<sup>2</sup> "Tier 2 suppliers" are the suppliers engaged by WGA's Tier 1 suppliers which are ultimately engaged to assist the Tier 1 supplier in providing goods and services to WGA.

# WGA



# 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.

An additional challenge is that the most prevalent modern slavery risks are often present deeper in the supply chains beyond the Tier 1 suppliers that we directly engage, which in itself poses challenges due to a lack of oversight and control over the suppliers deeper in these supply chains.

To have an effective risk assessment and due diligence system, multiple risk factors must be examined to determine where modern slavery risks sit in our operations and supply chains.

Accordingly, WGA’s risk matrix considers a variety of risk factors to assess the modern slavery risks of a supplier. This risk matrix has been developed with the assistance of our third-party advisors and incorporates resources such as the [Walk Free Foundations 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.

### 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.

### 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 also takes into account the “risk factors” associated with modern slavery. These factors include indicators or situations that are not direct evidence of actual modern slavery, but may suggest broader modern slavery practices, or particular vulnerabilities to falling into modern slavery practices, within the supplier. Some examples of risk factors include:

- Significant overtime hours and/or failure to pay overtime rates
- Lack of personal protective equipment (PPE)
- Failure to pay minimum wage or living wage

The foundation of our risk assessment and due diligence framework is the UN Guiding Principles (“UNGP’s”), in particular the “*cause, contribute to and directly linked to*”

framework. This framework underlies our approach to the assessment of both operational and supply chain modern slavery risk assessments:

<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

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

## OPERATIONAL RISKS

**Geographic:** WGA’s operations are located solely within Australia or New Zealand which are jurisdictions with a low prevalence of modern slavery. We acknowledge that despite operating in low-risk jurisdictions, we are not immune to the effects and risks of modern slavery.

**Industry:** We operate in an industry that is highly regulated and within our operations, our processes, and procedures to mitigate modern slavery risks include:

- Paying all employees 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.

- Equip our employees with safety training, procedures, tools, and personal protective equipment.
- Supporting our employees through our employee assistance program; and
- Providing modern slavery awareness training for all WGA employees.

We acknowledge that the use of subcontractors for the purposes of investigative work carries inherent modern slavery risks due to the lack of control and oversight over the arrangements of the subcontractors with their workers. In recognition of this risk, WGA have taken, and will continue to take, steps to address this operational risk. Accordingly, we consider that our operations carry a low risk of modern slavery.

## SUPPLY CHAIN RISKS

Like all entities, WGA is not immune to the risks of modern slavery. The key risks for WGA arise within our supply chains, particularly deeper within and beyond the Tier 1 level.

anticipate that the geographical locations of our suppliers will expand, altering the risk profiles of the associated supply chains.

Whilst 96.71% of our supply chains are based in Australia, as WGA continues to dive deeper into our supply chains, we

Using the “cause, contribute to and directly linked to” framework, the heightened modern slavery risks for WGA are:

INDUSTRY/SECTOR	RISK RELEVANCE
Excavation, building and construction	<p><b>UNGP Framework:</b> directly linked.</p> <p>Globally, around 18% of modern slavery victims are found in the construction industry. Supply chains associated with this industry can be long and complex, and entities often lack visibility over these supply chains.</p> <p>WGA engages with subcontractors for investigative/drilling services and other subcontractors and professional services subconsultants.</p> <p>Whilst our Tier 1 suppliers predominantly operate in Australia or New Zealand and carry out projects locally, we recognise that there is still an inherent risk associated with this industry.</p>
Cleaning and Facilities Management	<p><b>UNGP Framework:</b> directly linked.</p> <p>The cleaning and facilities management industry has been identified as a key risk area in Australia. The provision of cleaning services in facilities management poses concerns due to complex contracting, obscuring labour conditions and leaving vulnerable workers open to exploitation.</p> <p>WGA engages with cleaning companies to support its operations. We recognise that this industry carries heightened risk due to workforce vulnerability, opaque supply chains and general economic pressures.</p>
Branded clothing and merchandise	<p><b>UNGP Framework:</b> directly linked.</p> <p>The textile and merchandise industries are considered high-risk for modern slavery due to their complex and often opaque supply chains. Products can be manufactured in countries where workers, including children, can be exploited through forced labour, low wages, and poor working conditions. The demand for cheap goods exacerbates this issue.</p> <p>WGA procures branded clothing and PPE for staff use as well as promotional merchandise.</p> <p>In this reporting period, WGA has undertaken specific due diligence to address the modern slavery risks associated with its clothing and merchandise suppliers. This is detailed further in Criteria 4.</p>

## 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 in Criteria 4:



## 4—Actions to Address Modern Slavery

During this reporting period, WGA has focused on maturing our modern slavery compliance framework towards taking a risk-based approach with our supplier due diligence and expanding our due diligence efforts to further our visibility over our Tier 2 suppliers.

### 4.1 ACTIONS TO ADDRESS SUPPLY CHAIN RISKS SUPPLIER PORTAL

The foundation of our Modern Slavery Compliance Framework continues to be our supplier portal (“Portal”). When engaging new suppliers and on an annual basis thereafter, due diligence is performed via the Portal as part of our certified Business Management System.

#### SCREENING

All suppliers undergo independent due diligence screenings. The screening aims to spot modern slavery risks and broader ESG-related risks for a holistic risk assessment. In FY25, 919 suppliers were assessed.

We screen our suppliers against key risk 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



**Zero breaches**

Adverse due diligence screening results are assessed by our MSCC. To date, no adverse screening results have been presented relating to modern slavery or human rights breaches.

In addition to the risk screening process, suppliers are assessed against WGA's risk matrix.

Whilst many ESG-related issues (like poor safety performance) are not modern slavery issues, we understand that they can be precursors to modern slavery, as well as being an important consideration when choosing our suppliers. Should the adverse findings relate to general ESG risks but not directly relate to Modern Slavery, and therefore fall outside the purview of the MSCC, the MSCC will seek input from subject matter experts, including third-party external advisors for context or consideration.

#### RISK-BASED DUE DILIGENCE

During the reporting period, WGA moved to a risk-based due diligence workflow.

Rather than utilising a purely spend-based threshold to guide who is issued with a modern slavery questionnaire, WGA has implemented a risk element into its due diligence so that all suppliers with a predicated annual spend of \$30,000 or more and who are assessed as high or moderate risk suppliers under the risk matrixing and risk screening process will be issued with modern slavery questionnaires.

This targets WGA's due diligence efforts towards suppliers who pose heightened inherent modern slavery risks to WGA.



### CASE STUDY - MATURING TOWARDS RISK-BASED DUE DILIGENCE

During the reporting period, the Board approved, and WGA implemented a new risk-based due diligence threshold with the understanding that a risk-based approach is the recommended due diligence method by the UN Guiding Principles of Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct.

Whilst this will result in a reduction of modern slavery questionnaires being issued overall, it enables us to focus our energy towards our high-risk suppliers and undertake bespoke due diligence on these suppliers appropriate to the nature of the risks involved.

#### REFRESHER DUE DILIGENCE

In each reporting period, all existing suppliers who were engaged in prior reporting periods are subject to annual risk screening and risk matrixing. This is to ensure that WGA is aware of any changes in the risk profile of the supplier to ensure that any appropriate further due diligence is undertaken to mitigate the risk of modern slavery occurring in WGA's supply chains. This process will continue in all reporting periods going forward, including for any suppliers deeper in our supply chains identified in our supply chain tracing projects.

In the next reporting period, WGA will revisit our approach to refresher questionnaires which is outlined further in Criteria 7.

#### MODERN SLAVERY QUESTIONNAIRES

As mentioned earlier, we issue Modern Slavery questionnaires to suppliers who meet our risk-based due diligence criteria. These questionnaires are customised to reflect the specific risks of our industry and further tailored to each supplier based on their sector and individual risk profile.

For larger professional and project service suppliers, or those with more mature ESG practices, we also include broader questions about ESG topics, such as their approach to diversity, equity and inclusion, and how they manage risks related to bribery and corruption. We view these broader ESG areas as indicators of potential modern slavery risks, and they also help us meet our wider ESG legislative obligations, goals and commitments.

### CASE STUDY - SUPPLY CHAIN TRACING ON HIGH-RISK SUPPLIER

In FY25, WGA continued to prioritise supply chain tracing for high-risk suppliers, particularly those providing branded clothing. We recognise that linen and cotton supply chains are especially vulnerable to modern slavery due to their complexity and the prevalence of forced labour.

During the reporting period, WGA issued a Modern Slavery Questionnaire, including supply chain tracing questions to a prospective supplier of branded jackets for our team. Despite multiple follow-ups, the supplier declined to complete the questionnaire and failed to provide transparency about their Tier 2 supply chain.

As a result, WGA chose not to proceed with the purchase. The supplier's lack of engagement and unwillingness to share critical supply chain information did not align with our ethical sourcing standards or our broader modern slavery risk mitigation strategy.

#### SUPPLY CHAIN TRACING

During this reporting period, we continued tracing the supply chains of high-risk goods suppliers, with a particular focus on those providing branded clothing and merchandise to WGA. These supply chains carry elevated risks, especially where linen and cotton are involved.

While some suppliers have responded to our questionnaires, engaging others in the tracing process has been challenging. To improve this, we've reviewed our approach and developed action items to strengthen supplier engagement; some of which are outlined in Criteria 7.





### CASE STUDY - HIGH RISK RESPONSES TO MS QUESTIONNAIRE

One of the Modern Slavery questionnaires issued via our portal in the reporting period triggered a high-risk alert by one of our professional services suppliers.

In their response to the questionnaire, the supplier indicated that their workers were not free to come and go from the workplace, which is a known indicator of modern slavery.

To clarify, our team contacted the supplier by phone to discuss their response in more detail. During the conversation, the supplier recognised the answer they had provided was in error, and that their workers are, in fact, free to move between their workplace and homes/accommodation. Their response was amended to reflect the updated information, and the supplier provided written confirmation of the correction. Following this, the supplier was approved and added to our Approved Suppliers List.

### ESG PROCUREMENT POLICY AND GUIDE

WGA is committed to using our procurement spend for good by sourcing goods and services from those who reduce harm and positively contribute to the communities in which we live and work. To support this, we are developing a procurement policy and guide to enable all those who make purchasing decisions on behalf of WGA to contribute positively to environmental, sustainability, social equity, and ethical governance.

### SUPPLIER EXPECTATIONS

WGA communicates its expectations around modern slavery to suppliers through:

- Our Modern Slavery Policy
- The Supplier Code of Conduct
- Contractual clauses in our terms and conditions

During the reporting period, we began reviewing our Supplier Code of Conduct to ensure it remains relevant and reflects our growing expectations and future climate reporting obligations under the *Corporations Act 2001 (Cth)*.

### EMPLOYEE TRAINING

WGA provides modern slavery awareness training for all employees to assist our workforce in understanding why taking action to prevent modern slavery is important.



As of 30 June 2025, 98% of WGA's employees had undertaken modern slavery training. The training includes:

- What is modern slavery, including the prevalence of modern slavery globally;
- How everyone has a responsibility to create change to reduce the risk of modern slavery;
- What WGA does as part of its compliance obligations under the Modern Slavery Act 2018 (Cth);
- Providing a contact for concerns of suspected modern slavery.

In this reporting period, WGA reviewed the content of the training module to ensure the content remains accurate and relevant.

### SUPPLIER MODERN SLAVERY TRAINING



In the previous reporting period, WGA introduced online modern slavery training for suppliers identified as high-risk or those who showed limited understanding of modern slavery risks during the questionnaire process.

This training is now available to all suppliers via our Portal, with 40 suppliers accessing and completing the training in the reporting period.

The training provides helpful context and information for suppliers before they complete the modern slavery questionnaire and covers:

- What modern slavery is
- Reporting requirements under the Act
- How suppliers can carry out due diligence to reduce modern slavery risks in their operations and supply chains.

### SUPPLIER STOCKTAKE AND INDUSTRY CLASSIFICATION REVIEW

During the reporting period, WGA began a stocktake of its suppliers to ensure they are correctly classified in the Modern Slavery Portal based on their industry and the goods or services they provide.

When we first populated the Portal, we used broad industry categories to assess supplier risk. Over time, we've found that this approach sometimes groups low-risk suppliers into high-risk categories simply because they share an industry label with higher-risk suppliers.

To improve accuracy, we're now reviewing and updating supplier classifications to better reflect their actual risk to WGA.

This reclassification, combined with our updated risk-based due diligence process, will strengthen our framework and help us focus efforts where the risk is highest.

### ENGAGEMENT OF THIRD-PARTY ADVISORS

We acknowledge that addressing modern slavery is complex. To assist us on our modern slavery compliance journey we engage third-party advisors.



## 5—Assessing Effectiveness

In this reporting period, our focus has been on maturing our modern slavery compliance towards undertaking a risk-based approach to supplier due diligence and expanding our due diligence efforts on our Tier 2 suppliers to continue our progress with mapping suppliers deeper in our supply chains.

During the reporting period, we have undertaken significant reform to how we conduct supplier due diligence as well as how we are administratively utilising the Modern Slavery Portal to best capture the data and risk assess our suppliers. We believe that this will significantly improve our approach to supplier due diligence going forward.

As indicated in Criteria 4, part of this review has revolved around how we conduct supply chain tracing exercises. Based on this review, we have included actions in the FY26 reporting period to improve our processes surrounding supply chain tracing by providing education resources to suppliers to help them understand what information we need from them to conduct these supply chain tracing projects, and why we are doing so.

In the next reporting period, we will continue refining how we classify suppliers to ensure our due diligence targets those who pose heightened inherent risks to WGA.

Each year, we review our progress with third-party advisors and develop an action plan for the next reporting period. Some of these actions are detailed in Criteria 7.

This ongoing process helps to ensure that WGA are meeting the continuous improvement approach underlying the Act, and that we are meeting the targets that we set ourselves as part of the action plan development process.



## 6—Consultation

This Modern Slavery Statement is prepared by WGAGH. The included entities are the WGA Group.

Key teams and people who work across the WGA Group were engaged throughout this reporting period to drive the key initiatives undertaken in the drafting of this Modern Slavery Statement, including representatives of the Modern Slavery Compliance Committee, ESG Committee, Governance and Procurement team, Learning and Development team, and broader team members in senior leadership. Accordingly, consultation across our Group was extensive.

We also worked closely with our third-party advisors, who provide guidance on legislative requirements under the Act. They support us in developing action items for each reporting period to ensure WGA is complying with the continuous improvement approach that underlies the Act. Our third-party advisors have reviewed this statement for this purpose.



## 7—Looking Forward

In the next reporting period, our focus will be on reviewing and updating our refresher due diligence processes and continuing to expand our supply chain tracing progress.

Accordingly, some key action items for the next reporting periods are to develop a:

- Modern slavery refresher questionnaire to issue to high/moderate risk suppliers to continually assess their modern slavery risks; and
- Supply chain tracing supplier training module to accompany future supply chain tracing questionnaires issued to suppliers.

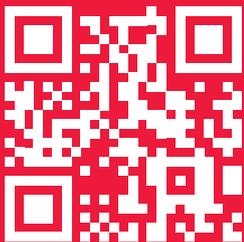
WGA will continue to mature our modern slavery compliance framework based on any changing circumstances to reduce the risk of modern slavery occurring in our operations and supply chains. This includes monitoring any amendments that are proposed to be made to the Act arising out of the 2023 statutory review of the Act conducted by Professor John McMillan, AO.



## Mandatory Reporting Criteria Guide

MODERN SLAVERY ACT 2018 (CTH) CRITERIA	PAGE REFERENCE
Criterion 1 - Identify the reporting entity	7
Criterion 2 - Describe its structure, operations and supply chain	8
Criterion 3 - Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or control	13
Criterion 4 - Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	15
Criterion 5 - Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	19
Criterion 6 - Describe the process of consultation with any entities the reporting entity owns or controls	20
Criterion 7 - Other information the reporting entity considers relevant.	21

# WGA



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

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