



Modern Slavery Statement

Vawdrey Australia

Introduction

This statement was approved by the board of Vawdrey Australia Pty Ltd in their capacity as principal governing body of Vawdrey Australia Pty Ltd on 2nd of June 2022

This statement, pursuant to the Modern Slavery Act 2018(cth) (Act), sets out the actions taken by Vawdrey Australia to address Modern Slavery risks in our business and supply chain for reporting period between 31 December 2020 and 30 June 2021. This is Vawdrey Australia's first statement under the act.

We are committed to continuous improvement in our processes to effectively identify and prevent risk, and remediate any circumstance of Modern Slavery in our business or supply chain, and this commitment is underpinned by our Company Values:

- Be honest, forthright and ethical in our dealings.
- Encourage collaboration and accountability.

Reporting Entities

This statement applies to Vawdrey Australia Pty Ltd (66 005 075 052) and each wholly owned entity of Vawdrey Australia including:

- Vawdrey Manufacturing Pty Ltd (92 084 490 906)
- Vawdrey Australia NSW Pty Ltd (93 110 693 573)
- Vawdrey Australia QLD Pty Ltd (16 131 674 247)

Vawdrey Australia's Structure, operations and supply chains

Vawdrey Australia is a privately-owned company. It is the nation's largest privately own trailer manufacturer.

Vawdrey Australia manufactures and sells the following brands of semi-trailers throughout Australia:

- Titeliners
- Iceliners
- Dry Freight Vans
- Skeletal
- Prairie Wagons
- Semis
- Wingliner
- Latchliner
- Dollies



Our operations in Australia include:

- Manufacturing facility located in Dandenong South.
- Vawdrey Service and repairs centres located in Dandenong South, Victoria, Eastern Creek, New South Wales, Larapinta, Queensland.
- Vawdrey Australia engages 380 Full time employees across Australia
- Our Supply chain consists of 500 suppliers

The risks of Modern Slavery practices in the operations and supply chains of Vawdrey Australia and its controlled entities

In Vawdrey Australia's assessment, there is negligible risk of the following practices occurring in its own operations, or the operations of the entities it owns or controls:

- Slavery
- Servitude
- Unlawful Child Labour
- Forced Labour
- Human Trafficking
- Debt Bondage
- Slavery like practices
- Deceptive recruiting for labour or services

Because:

- i. Vawdrey Australia workers are engaged in direct employment relationships, subject to relevant awards or industrial instruments, and at all times, subject to National Employment Standards under the Fair Work Act 2009.
- ii. Our employees have free choice of employment. The use of forced, bonded or involuntary labour does not occur.
- iii. Vawdrey Australia ensures it complies with the national minimum age of employment.
- iv. Vawdrey employees are not permitted or encouraged to incur debt through recruitment fees, fines or other debts to their employing entity.
- v. Vawdrey employees are not required to lodge deposits or identity papers with Vawdrey and are free to seek other employment at any time.
- vi. Employees are free to leave their place of employment after their shift.
- vii. Wages or benefits for a standard working week meet or exceed all legal requirements.
- viii. Deductions from wages as a disciplinary measure do not occur. Any deductions which are not permitted by law do not occur unless the employee has consented.
- ix. Employees have the right to join or form trade unions or to collectively bargain.



- x. Vawdrey Australia adopts an open attitude towards the activities of trade unions, workers representatives and their organizational activities and does not prevent or interfere with legitimate trade union activity.
- xi. Our operations occur in jurisdictions where adherence to law is the norm and transparent and strong labour system exist, subject to sound regulatory oversight.

Actions and due diligence processes taken by Vawdrey Australia and its controlled entities to assess and address risks of Modern Slavery practices

Vawdrey Australia has robust formal policies and systems already in place to promote and ensure ethical and legally compliant business conduct in its operations. These policies include our Code of Conduct, which contributes to our commitment to prevent modern slavery in our business.

Given available internal resourcing, it is necessary for Vawdrey Australia to strategically focus its efforts in each reporting period on those areas which we assess to present an elevated risk of exposure.

Major focus areas for the Reporting Period

Cleaning: Industrial cleaning is considered to be a known high-risk sector and accordingly, Vawdrey Australia determined to address this risk in its business during the reporting period. Vawdrey Australia uses a local cleaning service that has over 10 years' experience in domestic and commercial cleaning services.

Recruitment Practices: The contract with a supplier of recruitment services in the Philippines was negotiated to include appropriate terms to ensure deceptive recruitment practices did not occur, and that workers would not be subjected to forms of Modern Slavery, in particular debt bondage, in connection with the recruitment services.

Looking forward:

In the FY23 reporting period, our focus areas will be:

- Delivery of appropriate training on Modern Slavery issues to relevant officers and employees of Vawdrey Australia.
- Commencing broader supplier engagement on Modern Slavery, initially by educating suppliers about Vawdrey Australia's commitment to eliminating Modern Slavery in its Supply Chain.

How Vawdrey Australia assesses the effectiveness of its actions and due diligence processes



At this stage, the effectiveness of our actions and due diligence processed will be measures via:

- Training: Completion of Modern Slavery awareness training by 100% of nominated employees.
- Reports: Any circumstances of Modern Slavery being identified or reported, and appropriately remediated.

The Process of Consultation

Vawdrey Australia's Senior Management group receive regular updates from Anti-Slavery Australia.

Senior Management of Vawdrey Australia are aware of the contents of this statement.

The Management of each reporting entity have approved, by resolution, the issuing of this statement.

Other relevant information

Vawdrey Australia's progress in addressing Modern Slavery risks in our business and supply chain during the Reporting Period was hampered by the fact that administrative and management resources that would have otherwise been available, were diverted to address the effect of, and regulatory activities arising from, the Covid 19 Pandemic.

Michael Vawdrey
Director
Vawdrey Australia Pty Ltd
Date: 24/08/2022

Paul Vawdrey
Sales Director
Vawdrey Australia Pty Ltd
Date: 24/08/2022

