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Modern Slavery Statement 2024

About This Statement

This statement, pursuant to the Australian *Modern Slavery Act 2018* (Cth) (Act), contains the activities undertaken by **Waco Kwikform Ltd** (“**Waco Australasia**”, “**Waco**”) ABN 48 002 835 396 to understand and address modern slavery risks in our business operations, and supply chain for the financial year **1 July 2023 to 30 June 2024**. This is a combined statement on behalf of all entities within the Waco Group. It has been approved by the Board of Directors and has been signed by the Managing Director.

Acknowledgement of Country

Waco Australasia acknowledges First Nations people as the traditional custodians of the country throughout Australia, and their continuing connection to community, land and sea. We pay our respects to the past and present Elders of this nation and to the continuation of cultural, spiritual and educational practices of Aboriginal and Torres Strait Islander peoples.



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Managing Director's Message

I am pleased to present our Modern Slavery Statement, which outlines Waco Kwikform's commitment to upholding human rights and combating modern slavery across our operations and supply chain.

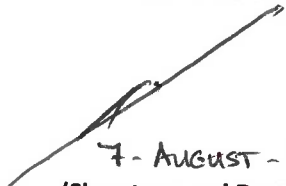
As Waco Kwikform's CEO I am committed to advancing our efforts to address modern slavery and broader human rights impacts. The challenges posed by modern slavery demand continuous improvement, aligning our actions with emerging risks, regulatory standards, and evolving stakeholder expectations.

Throughout this year, Waco Kwikform has intensified efforts to enhance our understanding of potential modern slavery risks within our operations and supply chain. Our longstanding commitment to putting people first has played a pivotal role in maintaining strong relationships with our suppliers and empowering staff to continue to create a safe and inclusive workplace.

I invite you to explore our Modern Slavery Statement, detailing our progress and future plans to contribute to shaping a future free from modern slavery. Together, we strive to make a meaningful impact, driving positive change within our industry and beyond.

Sincerely,

Mike Els
Chief Executive Officer
Waco Australasia


7 - AUGUST - 2024
(Signature and Date)



1. Reporting Entity Identity

This modern slavery statement has been prepared as a joint statement on behalf of the Waco Australasia group of companies. This joint statement has been prepared for Waco Kwikform Limited (ABN 48 002 835 396) and its wholly owned subsidiaries:

- Waco Kwikform Limited (ABN 48 002 835 396) trading as “Waco Kwikform”
- Waco Kwikform Limited (ABN 48 002 835 396) trading as “Star Scaffolds”
- Waco Kwikform Leasing Pty Ltd (ABN 98 073 932 135)
- APL Kwikform Pty Ltd (ABN 65 010 795 785) trading as “United Scaffolding Group”
- Kwikform Industrial Services Pty Ltd (ACN 165 660 551)
- Kwikform Maintenance Services Pty Ltd (ACN 622 981 202),
- Kwikform Labour Services Pty Ltd (ACN 646 377 013) and
- Star Labour Services Pty Ltd (ACN 629 713 391).

This group of companies is collectively referred to as ‘Waco’.

Waco takes a ‘whole of company’ approach to its modern slavery risk management. Unless specified, references in this Statement to Waco, or to “we”, “our” or “us” includes a reference to all entities covered by this statement.

2. Reporting Entity Structure, Operations and Supply Chain

Waco Kwikform Ltd, is a privately owned subsidiary of Waco International who are headquartered in South Africa, with a network of branches globally. Waco International are recognised as a leading industrial services business focusing on the hire, sale and manufacture of formwork, shoring, insulation, cladding, scaffolding, sanitation and hygiene, aerial work and suspended platforms and re-locatable modular buildings.

In Australasia, Waco Kwikform has been an industry leader in providing access solutions to the construction and industrial sectors since 1984. Our services include:

- Access solutions – scaffolding, rope access, hoists, and mast climbers
- Engineering and design services
- On-site labour and project management personnel
- Specialist services such as rigging, painting, and blasting

Our Vision is about enabling a better tomorrow, every day.

Our purpose is that we make it possible for people, companies, communities and environments to thrive.

Waco has proven experience gained over many years in successfully completing projects all over the country. Furthermore, we are one of the few companies in Australia to be able to handle very large-scale projects with a high degree of complexity. We are recognised as an industry leader and even more importantly to us, we have a high percentage of repeat business – as we overcome obstacles and come up with solutions to get the job done well, every time.



Our Values and Expectations

Our Shared Values

 <p>Care of People Caring for people is at the heart of our business</p>	 <p>Zero harm We value safety above all else and aim to do zero harm to people, communities and the environment</p>	 <p>Performance Meeting goals and exceeding expectations, delivering fit for purpose situations</p>	 <p>Customer Centricity We prioritize customers and strive to continuously improve their experience with us</p>	 <p>Innovation Responding to change we are actively committed to finding better ways of doing things, efficiently and sustainably</p>
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Our Expectations



Accountability is integral to upholding our beliefs, ensuring that every member of our team is committed to embodying them in their actions and decisions.

Transparency is paramount to us, guiding our commitment to openly communicate with honesty and integrity in all our endeavours.

Inclusivity is at the heart of everything we do, fostering an environment where every individual feels respected, valued, and empowered to contribute their unique perspectives.

Teamwork is fundamental to our approach, driving collaboration, synergy, and mutual support among all members to achieve shared goals efficiently and effectively.

Integrity is the cornerstone of our company culture, guiding us to always act with honesty, fairness, and ethical conduct in every situation, earning the trust and respect of our stakeholders.

We prioritize **best practices**, consistently seeking and implementing the most effective and innovative methods to ensure excellence in all aspects of our work.

Structure and Operations

In Australasia, Waco has a branch network of 24 locations and operates in every state and territory in Australia as well as the North and South Island of New Zealand. Our Corporate head office is located at Suite 202, Level 2, 3 Rider Blvd, Rhodes NSW 2138.

Relationships mean everything to us, as does maintaining our reputation for delivering outstanding work. As such, our teams are at the heart of everything we do. Waco has a workforce of over 700 employees, as well as a network of third-party contractors in the provision of our services. Waco is deeply committed to supporting the best outcomes for our employees, with over 70% of employees covered by an enterprise agreement. We aim to provide a diverse and inclusive



workplace and are actively working to drive cultural change through our Reconciliation Action Plan and through consultation with vendors who are Supply Nation Members to unlock the potential and value of including Indigenous businesses in our supply chain.



Image of Waco Australasia Network

Supply Chain

As a supplier of scaffolding, formwork and falsework, equipment for sale and hire, and provider of labour solutions Waco's supply chain is diverse.

Waco engages with a broad range of suppliers to provide the products we hire and sell, and the plant and services that allows us to run the business.

Our primary products include:

- Steel and aluminium scaffold and associated components purchased either directly from the manufacturer or through their Australian/NZ representative.
- Timber products being scaffold planks and formwork ply purchased either directly from the manufacturer or through their Australian/NZ representative.

Apart from directly employing labour in its yards and scaffolders on its projects Waco also engages labour through labour hire suppliers

As of 30 June 2023, the Groups supply chain comprised over 400 direct suppliers across 7 jurisdictions in Australasia. The majority of our suppliers are either Australian owned or based.

3. Potential Modern Slavery Risks in Our Business Operations and Supply Chains

We are in the early stages of assessing the modern slavery risks that may be present in our operations and supply chain. Utilising information from the *Global Estimates of Modern Slavery* and the *Global Slavery Index* published by Walk Free, along with other publications, has allowed Waco to begin to identify inherent risks which will continue to guide our assessment.

Through consultation with expert advisors and our own desk top research, we are aware of the general areas of risk that exist in our industry. These include:

- Exploitation of migrant workers in the construction and labour hire industries, including but not limited to underpayment and indenture
- Exploitation of workers in cleaning and security contracting, including but not limited to underpayment and indenture
- Poor labour conditions and child labour in the supply chain of building and construction materials, electronics, PPE, and textiles for uniforms.

We have begun a process of analysing our procurement data to identify hotspots for modern slavery in the regions, industries, and product categories that make up our supply chain. We have considered risks to people in our operations and have identified the following categories:

Our Own Employees

Waco is an entity operating within Australasia and as such modern slavery risks are likely to be extremely low due to established policies and processes in accordance with Australian regulations and legislation.

When recruiting we ensure that all employees have proof of their legal working rights which is recorded on their employee file. When sourcing candidates for employment, we use reputable agencies who are required to comply with the relevant labour laws of Australia and New Zealand.

Our processes in relation to recruitment, onboarding and compensation of all our direct employees are robust and regularly monitored for compliance with prevailing legislation including minimum rates of pay. Employee salaries are reviewed annually to ensure they are consistent with the market and other legal obligations including recent changes to superannuation contributions.

All direct employees prior to commencement are provided a written contract of employment which clearly outlines the terms and conditions they will be working under once they have commenced employment.

In addition to their employment contract, 70% of our direct workforce in Australia are covered by an enterprise agreement which provides for additional terms and conditions of employment. Of these enterprise agreements, more than half have also been made with their union. Where employees are not covered by an enterprise agreement, employees are paid above award.

The working hours of employees are captured using an electronic system that provides full visibility of employees' hours to ensure employees working overtime are compensated correctly and to ensure their health and wellbeing, with scheduled rest periods.

Indirect Employees - contractors and contingent workers

Waco has less oversight over the risks present in entities that are not under our control. However, we are aware that labour exploitation risks are higher in supplier categories that involve employment of migrant workers through third-party or outsourced providers.

Inherent risks include deceptive recruiting, debt bondage, non-payment, extreme working hours, poor occupational health and safety practices and forced labour.

Waco can however influence these outcomes through the awarding of contracts that specifically stipulate adherence to the standards which Waco have adopted.

Procurement

These are risks of modern slavery occurring in the various goods and services that form the products and services which we provide and also those that we utilise within our business operations. We have commenced by identifying major categories of known risk. These include:

- Timber Products
- Electronics and Software (mobile phones, laptops, tablets and cloud platform support)
- Manufacture of Steel and Aluminium Products
- Logistics and Warehousing
- Office supplies including furniture consumables and stationery
- Operations consumables including personal protective equipment
- Clothing such as uniforms and personal protective equipment
- Cleaning Services and waste management
- Security
- Professional Services
- Vehicles and heavy equipment

We are committed to acting ethically throughout our organisation by complying with all applicable legal obligations in the various jurisdictions we operate within. We take a zero-tolerance approach to any form of modern slavery.

Without having conducted a review, to date we have not been made aware of any allegations of human trafficking or slavery activities in our supply chain. If any allegations were to be made, we would immediately take appropriate action to investigate truth of the allegation, which would include informing relevant authorities and reviewing the use of the products and services within our supply chain.

Higher Risk Categories

The Company has identified that the following procurement categories may have a higher risk of modern slavery:

- Timber Products
- Electronics and Software (mobile phones, laptops, tablets and cloud platform support)
- Manufacture of Steel and Aluminium Products
- Office supplies including furniture consumables and stationery
- Operations consumables including personal protective equipment
- Clothing such as uniforms and personal protective equipment
- Cleaning Services and waste management
- Security



Higher Risk Locations

From our understanding of the Global Slavery Index, we understand that the following countries fall into the higher risk category:

- China
- India

At this stage we do not have any information to indicate we have any material exposure.

4. Actions Taken to Assess and Address these Risks

We care deeply for the people who work within our organisation and all those effected by any aspect of our operation. This ethos is reflected in our company values.

Waco Australasia respects all aspects of human rights as set out in the UN Declaration of Human Rights and has adopted the UN Guiding Principles of Business and Human Rights (UNGP'S) as an overarching framework through which to drive these standards. Waco is developing its approach to modern slavery in accordance with the United Nations - Protect, Respect and Remedy framework.

Training and Compliance

All new employees of Waco Australasia undergo induction and onboarding training that covers obligations under Waco policies and procedures such as:

- Code of Conduct
- Diversity and Inclusion
- Indigenous Inclusion
- Competition and Consumer Law
- Workplace Behaviour and Conduct
- Workplace Health and Safety
- Conflicts of Interest
- Issue Resolution and Grievance Matters
- Speaking Up
- Whistleblowers Hotline

The above policies provide the foundation for the expected conduct and behaviour of all employees and how the Company will manage unethical and/or illegal behaviour which may present itself including under modern slavery and trafficking legislation, thereby mitigating the risk that Waco Kwikform Ltd may have in relation to internal compliance issues.

All employee contracts have a specific provision that requires employees not to knowingly engage in unethical or unlawful activity or place themselves in situations that may be deemed unethical or unlawful.

Our Code of Conduct also sets out the guidelines for expected behaviour of our employees including for all employees to not knowingly participate or place themselves in a circumstance that may be unethical or illegal and to know the procedure on how to report unethical or illegal conduct.

All employees are trained in our Speaking Up Policy and how to use our Whistleblower Hotline as a mechanism to report unethical or illegal conduct and activity.

All employees are required to participate in regular refresher training, or when policies are updated, consulted with prior to the implementation, and then are trained on the updated version.

Human Rights Due Diligence

We are in the process of developing a human rights and modern slavery due diligence process to assess internal procedures and systems and engage with external groups potentially affected by our operations to ensure effective avenues exist to address problems as they arise.

Should it be uncovered in our supply chain that an individual supplier does not meet the UNGP'S we will enter discussions with these suppliers to firstly see if it is possible for them to raise standards within their supply chain and, if not, would seek alternative sources of supply.

The standards that we expect to be adhered to also extend to those people working within our supplier businesses and their supply chains. Our expectation is that human rights obligations under national and international law will be adhered to at all times and that all suppliers will cascade these principles down into their supply chains and ensure that all sub-contractors are meeting these obligations.

The methodology we have employed has been to:

- Begin to map and identify the key risks areas in our supply chain.
- Assess existing processes such as recruitment and use of labour hire agencies for potential risks
- Seek advice from experts within this field

5. Assessing Effectiveness

Waco acknowledges that while it may always have been committed to upholding human rights that we are in the very early stages of specifically addressing the issue of modern slavery.

Once our actions to assess and address modern slavery in our operations and supply chains has further progressed, we will begin a process to measure the effectiveness of actions taken. This may include assessing progress against KPIs and seeking feedback from stakeholders such as employees, suppliers, and subject matter experts.

6. Consultation with owned or controlled entities

Waco Kwikform Limited is the sole owner of our subsidiaries:

- Kwikform Industrial Services Pty Ltd
- Waco Kwikform Leasing Pty Ltd
- APL Kwikform Pty Ltd trading as 'United Scaffolding Group'
- Kwikform Maintenance Services Pty Ltd
- Kwikform Labour Services Pty Ltd, and
- Star Labour Services Pty Ltd.

All subsidiaries are managed and controlled through the Corporate office in Rhodes, NSW, Australia.



All subsidiaries are subject to the same governance and policy requirements. On an annual basis, Waco Australasia is subject to an independent audit process to assess any areas of exposure or deficiencies in its governance processes.

7. Additional Relevant Information: Future Actions & Ongoing Commitment

We acknowledge that we are on the early stages of this journey as to how we can better contribute to the prevention of modern slavery. We will continue to embed ethical sourcing in our business processes and undertake annual reviews to assess the effectiveness of our measures. We are seeking to embed supply chain labour rights as a 'business as usual' mindset across our business ecosphere.

Further actions that are currently under consideration include:

- Updating existing company policies and devising new policies to address modern slavery
- Introducing a Supplier Code of Conduct to address issues such as modern slavery, human rights, fair labour practices, workplace health and safety, and anti-corruption.
- Amend existing and future supplier contracts to include clauses to address modern slavery
- Targeted rollout of a Supplier Assessment Questionnaire
- Perform ongoing human rights due diligence and risk assessment being ever mindful that changes within the geo-political landscape can present new supply chain challenges.
- Consult with experts, peers and all stakeholders who have a common interest in eliminating slavery.
- Continue to adopt the recommendations of the review of the Modern Slavery Act reporting framework to benchmark our initiatives against international best practice and drive continuous improvement.
- Undertake education and training at senior levels within the organisation to raise awareness and commitment, as well as with targeted members of staff such as site managers, procurement, human resources, and legal teams.