MODERN SLAVERY POLICY
WGA-POL-PAC-0028_1

1. INTRODUCTION

WGA (**"we", "us", "our"**) is committed to upholding high ethical standards within its own operations and within the operations of those it does business with. Our operations are underpinned by our values and our vision to develop long-term and collaborative relationships with our customers, suppliers and our community more broadly. Additionally, we pride ourselves on continuously adding value to our customers by providing streamlined access to a broad range of integrated services.

We place people, together with enjoyment in what we do, at the heart of our operations and business. Accordingly, WGA has a zero-tolerance approach to any instances of modern slavery occurring in our operations or supply chains.

2. PURPOSE

Pursuant to the requirements of the Modern Slavery Act 2018 (Cth) (**"Act"**), WGA is committed to making annual public reports known as "modern slavery statements" on the actions that it has taken, and will continue to take, to address modern slavery risks in its operations and supply chains (**"MS Statements"**).

WGA recognises that modern slavery risks may arise indirectly through its operations or supply chains. In order to take effective action against modern slavery, WGA is committed to developing internal policies and procedures that support these actions.

The purpose of this Modern Slavery Policy (**"Policy"**) is to set out procedures to:

2.1 prevent, mitigate, and where appropriate, remedy modern slavery in our operations and supply chains;

2.2 encourage employees to raise any concerns and report instances of modern slavery or suspected modern slavery;

2.3 source products and services in accordance with legal obligations and community expectations while working with suppliers; and

2.4 help to ensure that WGA maintains high standards of ethical behaviour and integrity.

3. SCOPE

This Policy applies to all employees, directors, officers, agency workers, contractors, consultants or any other third-party representative of WGA or any related body corporates within the meaning of the Corporations Act 2001 (Cth).

4. WHAT IS MODERN SLAVERY?

Modern slavery is defined as the severe exploitation of other people for personal or commercial gain. Modern slavery describes situations of coercion, threats, or deception which are used to exploit victims and undermine their freedom.

Practices that constitute modern slavery include:

- slavery;
- slave trading;
- sexual servitude;
- forced labour;
- forced marriage;
- debt bondage;
- human trafficking; and
- child labour.

Although certain substandard working conditions, or the underpayment of workers, are harmful and may be evident in some situations listed above, they are not explicit modern slavery practices. Nonetheless, WGA takes these substandard working conditions seriously and will continue to work to remediate any substandard working conditions prevalent within its supply chains.

5. WGA'S ACTIONS AGAINST MODERN SLAVERY

5.1 Employee Training

To ensure employees are able to identify and report modern slavery (or suspected modern slavery), WGA will maintain an employee training program regarding modern slavery. The training will address:

- how to identify modern slavery;
- the process for reporting identified or suspected modern slavery; and
- the requirement to conduct due diligence on suppliers.

5.2 Reporting

WGA encourages all employees to report any genuine concerns about modern slavery relating to WGA's people, business, suppliers or supply chain. WGA will not punish a worker by neither dismissal or discrimination for raising concerns or issues regarding modern slavery.

All reports of modern slavery or suspected modern slavery will be taken seriously and investigated. WGA may engage a third party to assist with such investigation if it is considered necessary or desirable.

Reports, notifications, questions or concerns in relation to modern slavery should be made in writing to:

Chief Financial Officer
60 Wyatt Street
Adelaide SA 5000
08 8223 7433

5.3 Modern Slavery Compliance Committee

WGA has a modern slavery compliance committee (**"Committee", "MSCC"**) which will oversee WGA's modern slavery compliance and report all findings to WGA's Senior Leadership and Board. The Committee will be governed by the obligations outlined in this Policy.

5.4 Supplier and Third-Party Due Diligence

WGA acknowledges the potential for modern slavery to occur within its supply chains. As such, WGA will perform due diligence to identify risks of modern slavery in its operations.

5.4.1 Remediation

If WGA identifies any evidence of modern slavery in its supply chain, it may:

5.4.4.1 undertake further due diligence to assess the conduct;

5.4.4.2 provide notice of the conduct to the supplier to remedy the conduct; which may include

a) corrective action plans;
b) worker-centred remedies;
c) ongoing supplier monitoring; or

5.4.4.3 give notice to the supplier of the termination of their supply contract.

6. SUPPLIER CODE OF CONDUCT

All suppliers are expected to operate in accordance with the WGA Supplier Code of Conduct ("**Supplier Code of Conduct**"). The Supplier Code of Conduct sets out the standards of behaviour expected of business partners, stakeholders and people. The Supplier Code of Conduct expressly states WGA's commitment to human rights and our rejection of any form of modern slavery.

7. MINIMUM STANDARDS FOR SUPPLIERS AND THIRD PARTIES

All suppliers and third parties (collectively, the "**suppliers**") engaged by WGA are expected to meet the following minimum standards:

7.1 Working Conditions

Suppliers must provide a safe and hygienic working environment for their workers that does not present risks to their health or safety. A safe working environment includes a workplace environment where there is:

7.1.1 no discrimination based on personal characteristics, such as gender, ethnicity, religion, age, disability, marital status, sexual orientation or union membership;

7.1.2 no harassment or abuse, including physical, sexual, verbal, or visual behaviour that is offensive, hostile or intimidating; and

7.1.3 access to grievance mechanisms and recourse to prevent discrimination against workers for reporting any legitimate concerns.

7.2 Modern Slavery Practices

Suppliers must not use any form of modern slavery in its operations, including forced labour, debt bondage, child labour or indentured labour.

7.3 Wages

Suppliers must comply with all laws regulating local wages, including overtime compensation and legally mandated benefits.

7.4 Working Hours

Working hours should not exceed the maximum hours stated by local laws. If overtime work is agreed between the supplier and the worker, the hours should not be excessive or a regular occurrence.

7.5 Bribery and Corruption

Suppliers must not offer, pay or accept any bribes, favours, benefits or other unlawful or improper payments of any kind, regardless of whether this is connected with gaining business.

7.6 Sub-Contractors

Where a supplier is permitted to sub-contract to a third party, the supplier must appropriately manage the sub-contracting party to ensure they are acting in accordance with this and any other WGA policy.

8. MODERN SLAVERY STATEMENT

WGA or relevant parent entity will publish an annual modern slavery statement pursuant to the requirements of the Act (**"MS Statement"**). The MS Statement, amongst other matters, will address the criteria set out in the Act and identify the actions taken by WGA to assess and mitigate the modern slavery risks within WGA's operations and supply chains. The MS Statement will also outline plans for future improvements to the current modern slavery actions in place.

9. POLICY AVAILABILITY, REVIEW AND AMENDMENTS

9.1 Availability of this Policy

WGA employees can access this Policy and other relevant policies through self-service portals or the Company intranet. Suppliers can access this Policy via the WGA website.

9.2 Policy Review and Amendment

The Committee will review this Policy annually and shall report any amendments or proposals to the Joint Managing Directors This Policy can only be amended with the approval of the Joint Managing Directors. **Revision History**

APPROVAL REGISTER					
Rev	**Date**	**Issue/Change**	**Owner**	**Reviewer**	**Approver**
0	30/03/2023	New Document	MSCC	JMD's	Board
1	09/11/2026	Reviewed for alignment Act and company structure	MSCC	CFO	JMDs

Referenced Material

WGA-GUI-QAM-00010_5 Working with WGA – Supplier Code of Conduct