



CIVIL | WATER | ENVIRONMENT

MODERN SLAVERY STATEMENT

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MODERN SLAVERY STATEMENT

This statement is made pursuant to Section 14 of the Modern Slavery Act 2018(Cth) on behalf of WMS Engineering.

WMS is a privately owned business with offices in Brisbane, Cairns, Sydney, and Melbourne. WMS has approximately 20 full-time employees and specialises in providing water engineering services including stormwater design services, floodplain risk management services and computational fluid dynamics.

WMS is committed to eradicating acts of modern day and human slavery from within its business and supply chains. WMS acknowledges responsibility under the Modern Slavery Act 2018 (Cth) and will ensure transparency within the organisation and with our suppliers of goods and services.

As a water engineering company, WMS provides employees with equitable, fair, and legally compliant conditions of work. WMS has a suite of policies to ensure staff, including contractors and labour hire, all of whom are based in Australia, are afforded a workplace, and working conditions that are in accordance with Australian law, and are safe and free from discrimination. Wages, hours of work and other conditions are regularly audited to ensure compliance.

WMS engages a relatively small number of suppliers, all of whom are based in Australia. WMS' supply chain includes the services provided by cleaning companies for offices, IT infrastructure, the leasing of office space and equipment, office supplies and consumables. All suppliers are subject to a critical review before engagement by senior representatives.

In 2021, WMS introduced our first Modern Slavery Policy which reflects our processes and procedures for identifying modern slavery risks and our commitment to acting ethically and with integrity in all our business relationships and within our supply chain.

As part of our initiative to identify and mitigate risk, we have in place systems to:

- Identify and assess potential risk areas in our workplace and supply chain.
- Conduct due diligence to identify and mitigate the risk of slavery and human trafficking.
- Develop, improve, and implement appropriate remediation measures and
- Protect whistle blowers.

Where problems are identified, we will work with the supplier to develop corrective actions with agreed timeframes as part of the remediation plans. We have not identified any instances of modern slavery through our audit program this year.

Over the next year, our key focus areas will be:

- Implementing our Modern Slavery supplier questionnaire;
- Developing and publishing a Supplier Code of Conduct;
- Reviewing and updating our suite of risk-related policies and governance control measures;
- Stakeholder engagement on this issue, including delivering appropriate awareness training sessions on modern slavery principles to relevant WMS staff, our clients, and key suppliers; and
- Incorporating requirements into contractual processes.

INTRODUCTION

WMS recognises that all businesses have an obligation to prevent slavery, slavery-like practices and human trafficking and will do all in its respective power to prevent slavery, slavery-like practices, and human trafficking within its business and within the supply chains through which it operates.

This statement addresses WMS' obligations and compliance in relation to the 'Modern Slavery Act 2018 (Cth)' ("the Act") and applicable state legislation and highlights the steps we take to ensure there is no slavery or human trafficking occurring within the organisation or supply chains. One of our company's most valuable assets has always been its reputation for integrity and fairness. Maintaining this reputation within our market is an essential pre-requisite to our continued success.

Modern slavery can take many forms including the trafficking of people, forced labour, child labour, servitude, and slavery. As a leading engineering firm, we take our responsibility seriously and are aware of the potential for being targeted by traffickers and unlicensed labour hire providers. Our own processes around candidate engagement ensures our employees are alert to the signs

of exploitation, so that necessary action is taken promptly and effectively should it be identified. Sectors affected include, but are not limited to, construction and property, engineering and manufacturing and health and social care.

SUPPLY CHAINS AND RISKS OF MODERN SLAVERY

Suppliers to WMS Engineering

We contract with third party suppliers who provide services to assist with the everyday running of our business, such as IT service providers and property management companies (who, for example, may provide cleaning services to our offices) as well as companies who provide office supplies to our office network.

We engage subcontractors and subconsultants to provide complementary engineering services such as civil design and drafting, environmental assessment, town planning, and coastal engineering services.

We also engage companies that provide and maintain modelling software and access licenses as part of our core business operations.

We acknowledge that by virtue of contracting with other parties, whether as a client or as a supplier, there is always some risk that may contribute to modern slavery practices. We expect our suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally compliant, and professional manner by adhering to the WMS Code of Conduct. We also expect our suppliers to promote similar standards in their own supply chain(s).

ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Staff Engagement

WMS ensures that strict compliance checks are carried out for all candidates it hires. We verify the identity of each worker and their right to work before employment commences. Our payroll team audits the relevant modern award or enterprise agreement that a permanent or temporary worker is engaged under to ensure they are paid correctly in accordance with the relevant award or agreement requirements.

As part of our commitment to identify and eradicate slavery and human trafficking and to continuously assess and address modern slavery risks, we have in place a process to undertake due diligence on our supply chain network to ensure compliance with legislative obligations, and such compliance forms part of our contractual relationship with suppliers. We will use best endeavours to procure from our suppliers by contract that full compliance with the Act must be achieved. We will use best endeavours to separately require that any actual or potential risk of breaching the Act that suppliers identify in their own operations or supply chain(s) are communicated with us. This information will be assessed and evaluated by senior members of WMS management on an ongoing basis.

Supplier Code of Conduct

WMS is in the process of developing a Supplier Code of Conduct that will be relevant to all WMS suppliers. Suppliers will be expected to adhere to the WMS Code of Conduct, which includes specific reference to various matters including human rights, anti-bribery and corruption, and modern slavery and human trafficking. Suppliers should have in place policies recognising, respecting, and protecting the human rights of their employees, those of their suppliers and business partners, and the communities affected by the supplier's operations.

WMS' position, which is mirrored in its Supplier Code of Conduct, is that:

- Employees should be free to choose to work for their employer and to leave the company upon reasonable notice.
- All employees must be provided with a clear contract of employment, which complied with local legislation.
- All employees must be treated in a fair and equal manner and with dignity and respect.
- Any form of discrimination, victimisation, or harassment on any prescribed grounds under Commonwealth, state or territory laws should be prohibited. This includes marital status, pregnancy, family responsibilities, sex (including gender reassignment), race (including colour, ethnic and national origin, nationality), disability, sexual orientation, religious belief, age, trade union activity or any other prescribed ground.

- All applicable laws and industry standards on employee wages, benefits, working hours, and minimum age should be adhered to in all countries of operation, without any unauthorised deductions.
- All slavery and human trafficking laws must be complied with including, but not limited to, the provisions of the Act and any applicable state legislation. Suppliers must ensure their business operations are free from slavery and human trafficking practices whether in Australia or elsewhere, both internally and within their supply chain(s) and other external business relationships; and
- Cooperation with client due diligence.

Ability for Employees to Raise Concerns at Work

All WMS employees have access to dedicated channels through which they may voice concerns, either through local reporting mechanisms or through whistleblowing procedures. WMS is committed to protecting employees when disclosing malpractice and will ensure that all disclosures made in compliance with whistleblowing procedures will be treated confidentially and without fear of retaliation. It is by receiving and evaluating feedback and maintaining a culture of compliance that WMS can assess the effectiveness of its practices and procedures.

Training

All staff within WMS are expected to comply with all laws and act in accordance with local guidelines and regulations and act with integrity and honesty. We have undertaken to review our policies and procedures to ensure our colleagues have access to any additional information and support they may require with regard to human trafficking, forced labour, child labour, servitude, and slavery.

ONGOING ASSESSMENT OF THE EFFECTIVENESS OF THE ACTIONS TAKEN

We will undertake continuous and ongoing assessment of our supply chain(s) by evaluating information that we receive from our suppliers and to act promptly on allegations or findings of involvement in such practices.

We will also set up an annual review process whereby members of senior management will review our policies and procedures and our response to modern slavery.

MOVING FORWARD

WMS will continue to assess ways to reduce the risks of modern slavery and some steps to be taken will include:

- Development and publication of WMS' Supplier Code of Conduct;
- Engage directly with suppliers to assess their modern slavery policies and processes; and
- Set up an annual review process with members of senior management.