



MODERN SLAVERY STATEMENT

FOR THE FINANCIAL YEAR ENDING 30 JUNE 2024

INTRODUCTION

This Modern Slavery statement is issued by Wiley & Co Pty Ltd (Wiley, the Company) and covers the reporting period 1 July 2023 to 30 June 2024. This statement has been prepared with the requirements of the Modern Slavery Act 2018 (Cth) (Act) and uses the Act's definition of modern slavery involving conduct which would constitute a criminal offence under Australian law or international law, including trafficking in persons and the worst forms of child labour.

The Board of Wiley is committed to ensuring that Wiley meets its modern slavery obligations.

Within this Statement we outline the standards, policies and processes that contribute to our Modern Slavery risk management and control framework.

The Statement explains how we

- assess the risk of modern slavery within our business and supply chain,
- mitigate those risks through control processes,
- track our performance, and
- build increasing capacity and risk maturity.



At the heart of our operations lies a core belief in providing equal choices and chances for all.

This is reflected through our policies, initiatives and practices ensuring our workplace embraces differences, provides fair opportunities, and fosters an environment where everyone feels valued and safe and can contribute fully to the success of our family-owned company and our surrounding community.

We foster an environment where our people have access to the same opportunities. We recognise that individuals are unique and have different circumstances. We take our differences into consideration to remove any barriers, encouraging full participation and success in the workplace and in life.

We cultivate a place of work where employees feel valued, supported, and a part of the company's success. We actively seek the involvement of diverse team members in decision-making processes, value different viewpoints, and ensure everyone feels safe and welcome to express their ideas and identities.

We believe in treating every employee, client and project partner on their merits, without regard to non-relevant factors, ensuring fair and equitable outcomes. This approach not only enriches our company culture but also drives innovation, as diverse teams bring a wealth of perspectives and solutions to the table.

We commit to identifying and preventing all types of modern slavery throughout our operations, our subcontractors and our supply chain.



POLICY Professional Standards

*This document incorporates aspects of, and should be read in conjunction with, the Wiley Code of Conduct, Values and Codes. Wiley promotes and expects all team members, consultants, subcontractors and suppliers to demonstrate behaviour that is lawful and represents Wiley culture through its values and codes. It is the aim of these standards to provide a work environment regardless of location that is physically and psychologically safe and one where all Wiley team members, consultants, subcontractors and suppliers take on the responsibility to respect each other equally and act honestly in their decision making and actions.

Inclusion

Wiley is committed to fostering a workplace that is inclusive of difference. Regardless of sex, age, religion, race, colour, domestic status, disability, caring responsibilities, sexual orientation, pregnancy, political opinion or social origin, any person who works for and associates with Wiley shall not be treated less favourably than any other person.

Employment decisions and negative behaviour that are made on the basis of the above are not acceptable. Examples of these decisions and behaviour are:

- Allocating tasks and activities on factors other than the inherent requirements of the task and activity
- Failing to provide equal development opportunities
- Sharing or making visual material that may be deemed as offensive to any member of the Wiley team
e.g. posters, magazines, computer images
- Making or participating in inappropriate jokes or comments
- Offensive communication both written and verbal
- Offensive gestures or actions
- Isolating a person or people.

General workplace behaviour

Wiley employees, consultants, subcontractors and suppliers are expected to interact with any other person in a respectful, professional and courteous manner. All Wiley team members, consultants, subcontractors and suppliers are to act responsibly in an effort to maintain a harmonious and productive workplace.

When working with others, Wiley team members, consultants, subcontractors and suppliers are expected to:

- Ensure all activities are undertaken in a safe manner
- Have due regard for the rights and dignity of others
- Use language and gestures that does not offend, intimidate or threaten others
- Refrain from starting or engaging in gossip type conversations
- Follow all reasonable instructions given to you from your Leader
- Maintain confidentiality regarding personal and commercial matters
- Behave ethically.

All Wiley team members, consultants, subcontractors and suppliers should expect to be treated respectfully and fairly. If any person believes these standards are not being met, they are encouraged to confidentially discuss with their Manager and the People Team. Everyone is entitled to have a say and raise any issues or concerns, all managers need to respect issues and ensure they listen and respond accordingly without judgement.

Failure to meet these standards may result in disciplinary action and / or removal from Wiley workplaces



For anyone requiring additional support, please contact your Employee Assistance Program (EAP) provider or trusted support service.



OUR COMMITMENT

At Wiley we are guided by our Wiley Professional Standards in all that we do.

Wiley promotes and expects all team members, consultants, subcontractors and suppliers to demonstrate behaviour that displays honesty, integrity, ethics, and inclusivity.

Wiley maintains a continuous improvement approach to modern slavery.

We are fully committed to identifying, mitigating and managing the risks of all types of modern slavery throughout our operations and supply chain.

We will implement effective systems and controls and continuously improve them to address the risks of modern slavery within our business and across our supply chain.

OUR STRUCTURE

Wiley is a family-owned group of private companies comprising the following primary operational and related entities:

- Yellow Star Enterprises Pty Ltd (ACN 164 413 343), the sole shareholder of Wiley & Co Pty Ltd;
- Wiley & Co Pty Ltd (ACN 010 604 869), our operational business in Australia; and
- Wiley New Zealand Limited (NZBN 9429 047 187 283), our operational business in New Zealand.

Other controlled entities are passive investments and do not currently engage in operating activities.

This joint statement is issued by Wiley & Co Pty Ltd and covers Yellow Star Enterprises Pty Ltd and Wiley & Co Pty Ltd. References in this statement to Wiley are references to the two reporting entities and the entities they own and control.

In order to prepare this joint statement, we engaged with each of the reporting entities covered by this statement and consulted with the entities we own or control. The registered head offices of the reporting entities are at Level 3, 100 Ipswich Road, Woolloongabba, Queensland.





Our business

Wiley is a project delivery and construction business based within South-East Queensland, and New Zealand.

We have around 125 employees based in these locations and a supply chain that spans Australia and overseas at the date of this report.

Wiley operates as the head contractor in industrial/commercial construction, design and process engineering projects. The business also manages and designs the fabrication of specialty equipment that is used within the food manufacturing sector.

In performing our operations, Wiley engages a large subcontractor workforce and works with a significant number of manufacturers, fabricators and suppliers for construction materials and industrial process equipment.

Our direct workforce is primarily comprised of Project Managers, Engineers, Designers, Site Managers and Foremen, Contract Administrators and Cadets.

Our operating employment framework complies with all local laws and covers core employment conditions including (but not limited to) minimum wages, hours of work and leave entitlements.

Our business also provides all staff with access to additional employment benefits that reflect our Wiley values. These include complementary access to Wiley provided income protection insurance or health cover, in addition to an industry leading family leave policy.



Governance approach

The Wiley Board governs the activities of its controlled entities and the activities controlling the risks of Modern Slavery. Governance is conducted via the establishment of an approved policy framework. The board has delegated day-to-day responsibility for the requirements of the policy framework to management, with monitoring and reporting conducted by the Board.

The business maintains the following policies that support its governance in managing the risk of Modern Slavery: Whistleblower Policy, Quality Policy, Work Health and Safety Policy, Freedom of Association Policy, Harassment and Discrimination Policy and Wiley Professional Standards.

Risk assessment

Wiley operates the majority of its business within Australia and New Zealand. These jurisdictions operate with mature legal frameworks and have been assessed as low risk in the Global Slavery Index 2023 Study.

As a construction business, Wiley recognises the industry is considered to have an inherently higher risk for potential modern slavery within its operations and supply chain. This is due to the reliance on manual work, multi-layered subcontractor arrangements, and the complexity of local and international supply chains.

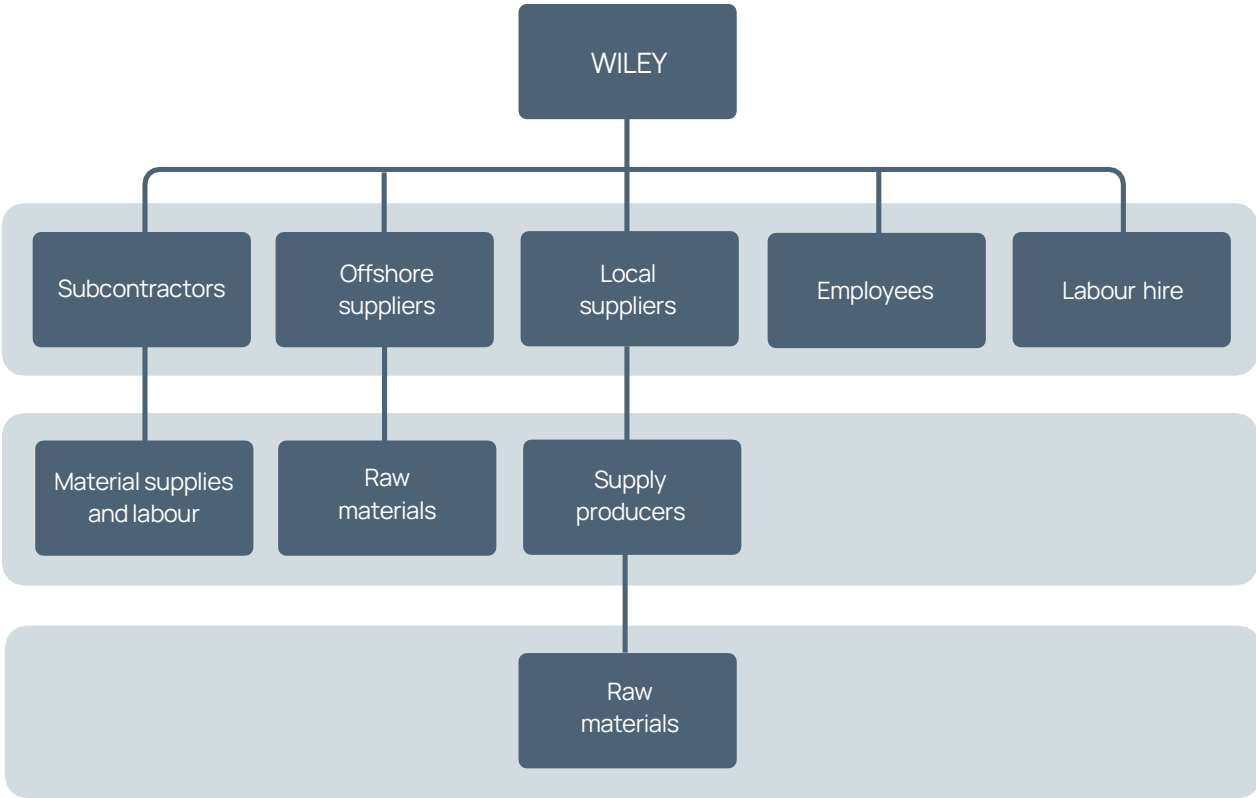
Reliance on base-skill labour and the use of third-party labour hire has been identified as a modern slavery risk.

Common high-risk materials used within construction include timber, bricks, stone, steel, glass, rubber, piping, cement, carpeting and tiles. Other potential areas can include electronics, process equipment, labour, security and cleaning services.

Our supply chain

Wiley operates a multi-tiered supply chain that includes subcontractors, suppliers, vendors, consultants, and JV Partners. Wiley's business strategy is to partner with businesses and embrace our core values and exemplify a genuine dedication to ethical and honest dealings.

Wiley Multi-layered Supply Chain



Due diligence and supply partner pre-qualification processes

All supply partners are subject to a rigorous pre-qualification and due diligence process during onboarding and are subject to post qualification review at periodic intervals. This process helps us select business partners that follow workplace standards and business practices that are consistent with those of Wiley.

Our supply partner selection process includes pre-qualification questionnaires and information requirements to assess the competence and compliance of the partner with legal requirements, health and safety standards, environmental requirements, and professional competence. Suppliers are asked specifically about compliance with Modern Slavery Requirements and whether they are aware of instances or concerns of modern slavery and human trafficking in their business or supply chain.

Where certain supply partners are assessed as having a greater compliance risk additional due diligence may be conducted that includes physical visits and inspection by Wiley staff, the application of industry references, and searches of third-party information sources. Risk may be determined based upon the location of the supply partner and the type of goods or service supplied.

Wiley takes all relevant steps when engaging third party suppliers to ensure all workers on our sites and as part of our supply chain are employed under the required terms and conditions of employment. This is performed by conducting due diligence when engaging labour hire providers, and Statutory Declarations by Subcontractors in respect of all their workers.

Adherence to our policies and standards

As a condition of doing business, Wiley requires compliance with our Professional Standards and Policies which set out the minimum requirements of conduct expected of our supply partners. These Standards and Policies apply to all third parties that provide goods or services to our organisation.



Strategies and actions taken

During the year the following activities were undertaken as we evolve our approach to Modern Slavery. These activities included:

- Continued training for employees on modern slavery.
- Further developing the Wiley business training and competency framework that encompasses modern slavery risk management.
- Engagement of third-party advisors in the review of Wiley labour arrangement and in ensuring the compliance of employee agreements with the relevant Award or local legislation.
- Refresh of safety management system documentation to make it clearer and easier to understand for all workers.
- Implementation of Industry best practice and widely used safety management software, Hammertech, across active project delivery sites to enable all workers to have easy access to safety policies, procedures and forms online.



EVALUATION AND EFFECTIVENESS

Wiley recognises the continuing evolution of supply chain management in managing the risks of modern slavery. The business continually measures the effectiveness of its supply chain management and the conformance of supply chain partners to our procurement standards. Measurement informs our management approach and drives the recommendations that we apply going forward.



Our continued focus

Wiley continues to evolve our approach to identifying, mitigating and managing the risks of modern slavery and has programmed a number of activities for the next 12-24 months that include:

- Update Subcontract Agreements and Subcontractor Tender Forms to incorporate modern slavery requirements.
- Continue increasing resourcing for operational risk management across the business.
- Enhance training and education for employees and our supply chain to address Modern Slavery risk factors.
- Continue development of deeper supply chain understanding via centralisation of procurement authorisation processes.
- Further develop the risk assessment framework for suppliers.
- Update the Whistleblower policy and introduce new mechanisms for internal and external parties to report potential or actual issues through an independent and anonymous whistleblowing service.
- Continuously improve of Hammertech safety management software to incorporate Modern Slavery risk management.
- Further refine and increase the frequency of the Pre-qualification/pre-mobilisation of subcontractors' questionnaire.
- Review Australian small businesses payment terms to help with cash-flow for the smaller businesses we engage.
- Progressively implement Procore project management software across active project delivery sites.



BOARD APPROVAL

This joint statement was approved by the board of directors of both reporting entities Wiley & Co Pty Ltd and Yellow Star Enterprises Pty Ltd on 12 December 2024 in their capacity as principal governing bodies of Wiley & Co Pty Ltd and Yellow Star Enterprises Pty Ltd. This statement is signed by Suzie Wiley, a member of the board of directors of Wiley & Co Pty Ltd and Yellow Star Enterprises Pty Ltd, in her capacity as a responsible member of Wiley & Co Pty Ltd and Yellow Star Enterprises Pty Ltd.

A handwritten signature in black ink that reads "S. Wiley".

Suzie Wiley
Managing Director
Wiley & Co Pty Ltd

Our values



Healthy and Safe.

At Wiley, safety is about mind and body. Together, we actively take care of ourselves & each other and seek ways to ensure everyone in our care, is also in the safest of hands. We back each other, hold ourselves to account and drive a culture that respects all potential harm. Healthy and safe is not just a statement, it is a state of being.



Future focus.

We plan and act with the big picture in mind. We enable and challenge ourselves and our clients to lead. We are always receptive to new ideas. We embrace change and the future with enthusiasm. We take pride in our ability to creatively problem solve and find the best solutions in every situation. Our belief in continuous learning reflects a pure delight and appreciation for creative discovery and innovation that leads to elegant solutions.



Empower our people.

We actively encourage and enable our people to develop and grow to their greatest potential. We embrace individuality and provide a flexible working environment in which there is room to learn from our mistakes. We support personal development and independence yet encourage teamwork and collaboration. By recognising and celebrating our individual and collective strengths, we empower our people.



Quality first.

We take pride in what we do and we do what makes us proud. We pursue excellence in a professional way through continual improvement. We set high standards for ourselves and others. Our passion for presentation and form is the tangible way we communicate our commitment to quality.



A sense of community.

We value relationships that include, nurture, support and protect our people as families do. We actively seek life balance by working hard, having fun and celebrating openly. We care passionately about the environment and our surroundings with an eye to making a difference where we can.



Integrity in all we do.

We take responsibility for being the best version of ourselves, being on-centre and holding each other to this ideal. We keep our promises and always follow through. We tell the truth, we do not hide, use excuses or blame. We respect each other equally and act honestly with courage.

INTEGRATED DESIGN • PROCESS ENGINEERING • CONSTRUCTION

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A family owned company for over 100 years