MODERN SLAVERY POLICY

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Modern Slavery Policy

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Modern Slavery Policy

1 PURPOSE

This Modern Slavery Policy sets out to explain and discuss the methodology taken by the Company to demonstrate our commitment to attaining a culture that fosters and promotes the human rights of our people, suppliers, customers, communities and other stakeholders.

This Policy covers all entities of WA Insurance Builders business, which includes:

- WA Insurance Builders Pty Ltd, and
- Restofix Services Pty Ltd.

2 SCOPE

This policy applies to all employees, directors, and business operations of WA Insurance Builders Pty Ltd and Restofix Services Pty Ltd. It outlines our commitment to identifying, preventing, and addressing the risks of modern slavery within our organisation and throughout our supply chains.

Although our Company is not currently required to report under the Australian Modern Slavery Act 2018, we recognise our responsibility to uphold human rights and promote ethical practices in all aspects of our business. This policy sets out the principles and practices we follow to minimise the risk of modern slavery, including forced labour, human trafficking, debt bondage, and child labour.

Contractors, subcontractors, and suppliers are expected to support the intent of this policy and adhere to standards that align with our values and legal obligations. Separate guidance and expectations are provided for third parties through our supplier and subcontractor engagement processes.

3 DEFINED TERMS

Acronym / Term	Definitions
Company	This term will reflect the collective companies: • WA Insurance Builders Pty Ltd; and • Restofix Services Pty Ltd
Modern Slavery	Systems and situations where coercion, threats, or deception are used to exploit people and deprive them of their freedom. This includes practices such as forced labour, human trafficking, debt bondage, child labour, and other forms of servitude.

4 OUR MODERN SLAVERY PRINCIPLES

WA Insurance Builders and Restofix Services is committed to conducting its business in a manner that upholds human rights and ensures ethical and transparent practices across its operations and supply chains.

While we are not required to report under the Australian Modern Slavery Act 2018, we recognise the importance of identifying, assessing, and addressing any potential risks of modern slavery. We are dedicated to continuously improving our processes to prevent any

form of exploitation, including forced labour, human trafficking, and other serious human rights violations, within our business and among our suppliers and contractors.

To support this commitment, we have established the below principles to emphasise our proactive and ethical approach, involving persons throughout our business:

1. **Zero Tolerance for Modern Slavery**
   We do not tolerate any form of modern slavery, including forced labour, child labour, debt bondage, human trafficking, or other forms of exploitation.
2. **Ethical Employment Practices**
   We are committed to fair wages, safe working conditions, voluntary employment, and compliance with Australian workplace laws for all workers.
3. **Supply Chain Due Diligence**
   We assess and engage with suppliers and subcontractors who share our commitment to ethical and lawful practices, and we take reasonable steps to identify and manage modern slavery risks in our supply chain.
4. **Risk-Based Approach**
   We prioritise our efforts by identifying areas of higher risk in our operations and supply chains and applying appropriate mitigation and monitoring strategies.
5. **Transparency and Accountability**
   We promote open communication and accountability by encouraging the reporting of any concerns or suspected breaches of this policy, without fear of reprisal.
6. **Training and Awareness**
   We provide training and information to relevant staff to increase awareness of modern slavery risks and promote responsible business practices.
7. **Continuous Improvement**
   We regularly review and refine our systems, processes, and relationships to enhance our ability to detect and respond to modern slavery risks.
8. **Legal and Regulatory Compliance**
   We ensure that our practices and those of our business partners comply with applicable laws and support the intent of the Australian Modern Slavery Act 2018.

5 OUR EMPLOYMENT PRACTICES

WAIB is firmly committed to upholding ethical employment practices that protect and promote the rights and dignity of all our employees.

We ensure that every individual is engaged in voluntary employment under fair conditions, where clear terms, equal opportunities, and safe, healthy working environments are the norm. Our policies reflect our dedication to providing a workplace free from any form of modern slavery, reinforcing our belief in transparency, accountability, and respect for human rights.

1. **Voluntary Employment**
   All employment is freely chosen. We do not use any form of forced, bonded, or involuntary labour.
2. **Fair Pay and Benefits**
   We pay employees fairly, in line with applicable awards, enterprise agreements, and workplace laws, including superannuation and entitlements.
3. **Safe and Healthy Working Conditions**
   We provide a safe and healthy work environment and take all reasonably practicable steps to eliminate risks to health and safety.

4. **No Child Labour**
   We do not employ individuals under the legal minimum working age and comply with all relevant child employment laws.
5. **Freedom of Association**
   We respect the right of employees to join (or not join) trade unions and engage in lawful industrial activity.
6. **Clear Employment Terms**
   All employees are provided with clear, written terms of employment that outline their rights, responsibilities, and working conditions.
7. **Equal Opportunity and Non-Discrimination**
   We provide equal employment opportunities and do not tolerate discrimination, harassment, or victimisation in any form.
8. **Grievance and Whistleblower Protection**
   We maintain accessible grievance procedures and whistleblower protections to allow employees to raise concerns without fear of retaliation.
9. **Regular Review of Practices**
   We periodically review our employment practices to ensure ongoing compliance with laws and alignment with ethical standards.

6 OUR CONTRACTORS AND SUPPLY CHAIN

We acknowledge that modern slavery risks can exist at various points within supply chains, particularly in industries such as construction and building services.

As part of our commitment to ethical business practices, we are dedicated to working with suppliers and subcontractors who uphold the same high standards of integrity, transparency, and respect for human rights.

These commitments guide our approach to supplier engagement, risk assessment, and ongoing due diligence to help prevent and address any potential instances of modern slavery in our operations. This includes:

1. **Responsible Supplier Selection**
   We engage with suppliers and subcontractors who demonstrate a commitment to ethical labour practices and compliance with applicable laws.
2. **Modern Slavery Risk Assessment**
   We assess the potential for modern slavery risks in our supply chains, prioritising higher-risk goods, services, or geographic regions.
3. **Supplier Code of Conduct**
   We implement and communicate clear expectations through a Supplier Code of Conduct that outlines our standards on labour rights, human rights, and ethical conduct.
4. **Contractual Obligations**
   We include provisions in supplier agreements requiring compliance with modern slavery laws and our ethical standards.
5. **Ongoing Supplier Engagement**
   We build collaborative relationships with suppliers to promote awareness, encourage good practices, and support continuous improvement in managing modern slavery risks.
6. **Training and Awareness for Procurement Staff**
   We provide relevant training to employees involved in procurement to ensure they understand modern slavery risks and how to identify red flags in the supply chain.

7. **Investigation and Response**
   We take prompt and proportionate action if we become aware of modern slavery practices in our supply chain, including investigation, remediation, and, where necessary, termination of supplier relationships.
8. **Continuous Review and Improvement**
   We regularly review our supply chain management practices and update our processes to improve transparency and reduce the risk of modern slavery.

7 REPORTING AND TRANSPARENCY

Although WA Insurance Builders and Restofix Services is not required to report under the Australian Modern Slavery Act 2018, we are committed to being transparent about our efforts to prevent modern slavery in our operations and supply chains.

We take a proactive approach by:

- Documenting our risk assessment processes, supplier due diligence, and staff training activities;
- Monitoring and reviewing our modern slavery risk management practices on a regular basis;
- Maintaining internal records of any reported concerns, investigations, and actions taken in response to modern slavery risks; and
- Sharing relevant information with clients, business partners, or other stakeholders on request, where appropriate.

We view transparency as an important part of building trust with our workforce, suppliers, and the broader community.

8 EXTERNAL REFERENCES

Documentation and references of external origin that are related to this document are referenced in the below table.

Name of Reference	Source of Reference
Modern Slavery Act 2018 (Cth)	Australian Government: Attorney-General's Department

9 DOCUMENT CONTROL

All amendments to this document are recorded in the below table.

Register of Amendments				
Date	**Version No.**	**Description of amendments**	**Prepared by**	**Approved by**
01/03/2019	1	Original Issue	General Manager	Managing Director
20/03/2025	2	Full Review	General Manager	Managing Director