



# **MODERN SLAVERY STATEMENT**

FOR THE FINANCIAL YEAR ENDING 30 JUNE 2021

WILEY & CO PTY LTD - Level 3, 100 Ipswich Road, Woolloongabba, Queensland - AUGUST 19, 2021



## INTRODUCTION

This Modern Slavery Statement covers Wiley and operational subsidiaries and related entities for the financial year 30 June 2021

Modern slavery is a crime and violation of fundamental human rights. It can take various forms including trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour & services, and the worst forms of child labour.

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

## OUR COMMITMENT

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

<https://www.wiley.com.au/wp-content/uploads/2020/11/Professional-Standards-Doc.pdf>

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

Wiley maintains a zero-tolerance approach to modern slavery.

We are fully committed to acting in identifying and preventing all types of modern slavery throughout our operations, sub-contractors, and supply chain.

We will implement effective systems and controls to continually challenge our ability to combat modern slavery within our business and across our supply chain.

## OUR BUSINESS

Wiley is a project delivery and construction business based within South-East Queensland that services Australia, New Zealand, Thailand, and Malaysia.

We have more than 200 staff based across these locations and a supply chain that spans Australia and overseas.

Wiley operates as the head contractor in industrial/commercial construction, design and process engineering projects. The business also designs and arranges 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 Foreman, 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.

Our operating entities covered within this statement include Wiley & Co Pty Ltd and Stomppy Australia Pty Ltd.

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

The registered head offices of the business are at Level 3, 100 Ipswich Road, Woolloongabba, Queensland.

## **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. Management execute the requirements of the policy 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: Whistle-blower Policy, Modern Slavery Policy, Quality Policy, Work Health and Safety Policy, Freedom of Association 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 2018 Study. When operating within Thailand or Malaysia the inherent risk of Modern Slavery is assessed as being elevated due to the impacts of local conflicts and poor governance.

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 sub-contractor arrangements, and the complexity of local and international supply chains.

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

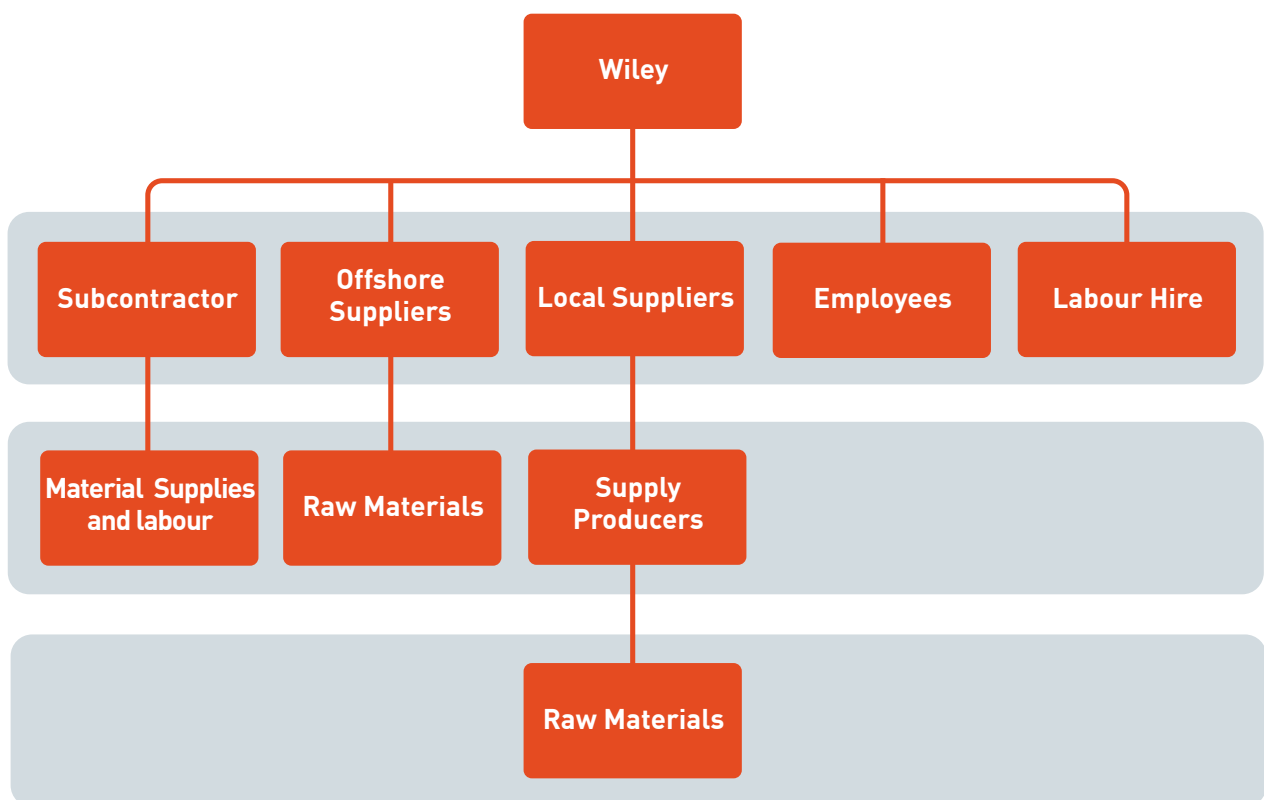
Wiley also recognises the potential impact of COVID-19 on global supply chains and the increased risk of modern slavery across those networks.



## OUR SUPPLY CHAIN

Wiley operates a multi-tiered supply chain that includes sub-contractors, 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 Prequalification Processes

All supply partners are subject to a rigorous prequalification 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 prequalification 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.

## Adherence to our Policies and Standards

As a condition of doing business, Wiley requires compliance with our Professional Standards which sets for the minimum requirements of conduct expected of our supply partners. These Standards 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,

- Further refining pre-qualification processes applied over supply partners to assess management and compliance practices
- Conducting detailed training for key Executive Team members with materials developed by Anti-Slavery Australia and the University of NSW
- Developing COVID Safe remote methods for physically assessing site and supplier locations via remote technology
- Implementing a Wiley business training and competency framework that encompasses compliance risk management
- Joining the Supply Chain School. This initiative provides training and assessment for participants in creating sustainable supply chains for property, construction, and infrastructure industries
- Review of smaller supply partners within the context of the Australian Governments Payment Times Reporting program
- 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



## 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 impacts the maturity of our management approach and drives the recommendations that we apply going forward.

## OUR FOCUS FOR NEXT YEAR

Wiley continues to evolve our approach to supply chain management and has programmed a number of activities for the next 12-month period that include;

- Increased resourcing for compliance and investigation within our Project Management Office
- Roll out of further training within the Wiley Training System addressing Modern Slavery risk factors
- Development of deeper supply chain understanding via centralisation of procurement authorisation processes
- Further development over the assessment framework for supplier conduct
- Implementation of a business wide Anti-Bribery policy setting that provides further guidance on the ethical dealing of the business, and
- Update of the Whistle-blower policy and the introduction of new mechanisms for internal and external parties to report potential non-compliance

## BOARD APPROVAL

This statement was approved by the Wiley Board of Directors on 28th October 2021.



**Robert Barron** | Wiley - Chief Executive Officer