



MODERN SLAVERY STATEMENT

FOR THE FINANCIAL YEAR ENDING 30 JUNE 2025

Introduction

This Modern Slavery Statement is issued by Wiley & Co Pty Ltd (Wiley, the Company) and covers the reporting period 1 July 2024 to 30 June 2025. 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 Wiley Board ("the Board") 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

- identify and assess the risk of modern slavery within our business and supply chain,
- take action to mitigate those risks through control processes,
- track the effectiveness of our actions, and
- consult and build capacity.



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. We are committed to ensuring our workplace embraces differences, provides fair opportunities, and fosters an environment where everyone feels valued and safe. This enables all team members to contribute fully to the success of our family-owned company and our surrounding communities.

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.



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, track the effectiveness of our actions, and continuously improve them to address the risks of modern slavery within our business and across our supply chain.

Identification of the reporting entity

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 and the parent entity of the group;
- 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.

All other controlled entities within the group 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 to Wiley in this statement are references to the two reporting entities and the entities they own and control.

The registered head offices of the reporting entities are located at Level 3, 100 Ipswich Road, Woolloongabba, Queensland, 4102.



Our business structure and operations

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, primarily in Queensland and New South Wales. 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, Project Co-ordinators, and Cadets.

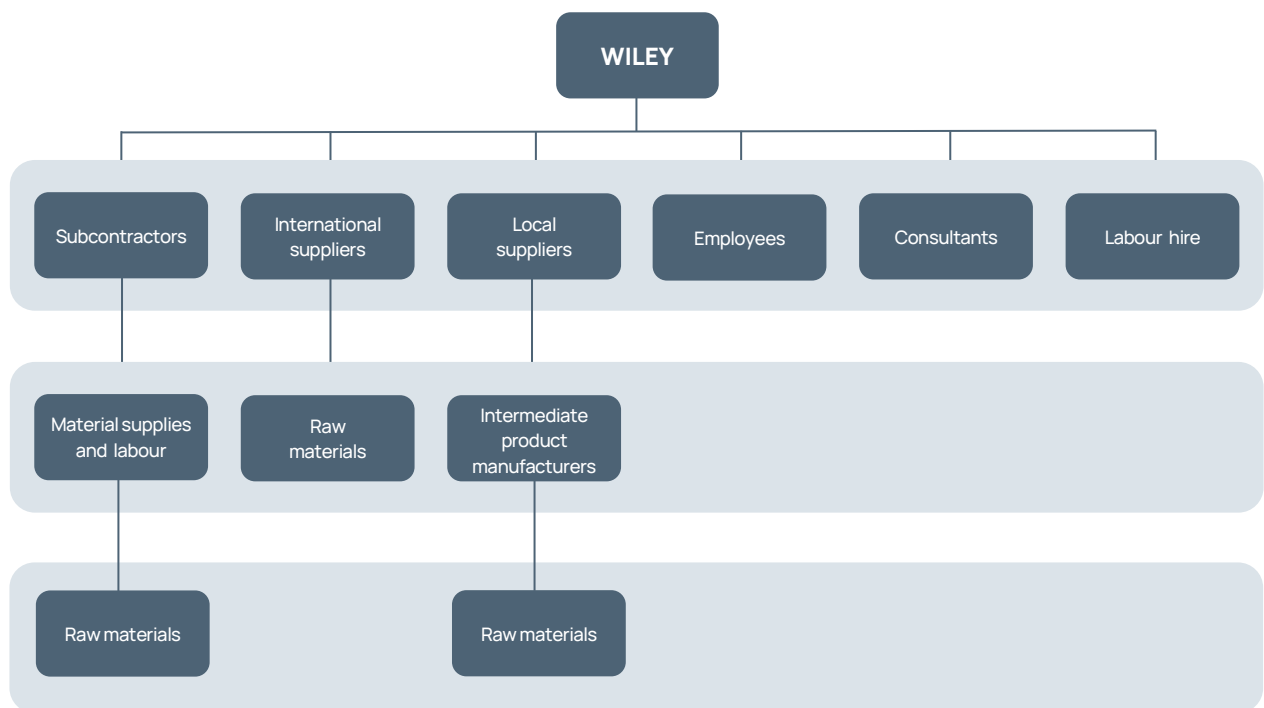
Our operating employment framework complies with all local laws and covers core employment conditions including (but not limited to) minimum wages, hours of work, and leave entitlements.

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, an industry-leading family leave policy, a dedicated employee assistance program (EAP), and support of tertiary education costs for those new to the industry.

Our supply chain

Wiley operates a multi-tiered supply chain that includes subcontractors, local and international suppliers, employees, labour hire, and consultants. 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



Risks of modern slavery in operations and supply chains

Wiley operates the majority of its business within Australia and New Zealand. These jurisdictions are supported by mature industrial relations systems and legal and regulatory frameworks and have been assessed as low risk in the Global Slavery Index 2023. However, we recognise that modern slavery risks exist in low-risk regions, such as Australia and New Zealand, particularly in high-risk industries such as construction.

As a design and construction business, Wiley operates a multi-tiered supply chain that includes subcontractors, labour hire, local and offshore suppliers and consultants. Wiley recognises the construction industry is inherently exposed to modern slavery risks due to its:

- Reliance on low-skilled and visa-dependent labour;
- Use of labour hire agencies where transparency on employment terms and conditions may be reduced;
- Complex subcontracting arrangements with more than one layer;
- Global supply chains for raw materials, manufactured products and technical equipment.

Key areas of identified risk – FY25 risk assessment

Wiley's FY25 modern slavery risk assessment highlighted the following high-risk areas:

1. Subcontracting

Subcontracting practices introduce complexity and limit visibility over employment conditions, especially among lower-skilled workers and migrant workers. Use of labour hire agencies by subcontractors limits visibility on recruitment conditions. Workers on temporary visas, migrants, apprentices, and trainees are considered high risk. Modern slavery risks include forced labour, debt bondage, child labour and human trafficking.

2. Construction material supply chains

Wiley procures a range of common high-risk materials, including:

- Steel, glass, bricks, tiles, and stone – often sourced globally;
- Timber, piping, cement, rubber, and insulation – where traceability at the raw material extraction or processing level is difficult;
- Personal protective equipment (PPE), uniforms, electronics, and mechanical plant – all of which may have components or sourcing links to high-risk countries and sectors.

Modern slavery risks include forced labour, debt bondage, child labour and human trafficking that arise from suppliers and producers based in jurisdictions and sectors with poor labour protections, high corruption, and weak regulatory oversight.

3. Labour hire

Use of labour hire agencies by Wiley limits visibility on recruitment conditions. Workers on temporary visas, migrants, apprentices, and trainees are considered high risk. Modern slavery risks include forced labour, debt bondage, child labour, human trafficking

Our actions taken to assess and address modern slavery risks

In FY25 Wiley assessed its inherent modern slavery risk as medium and its residual modern slavery risk as low.

Our assessment on residual risk accounted for the mitigating controls in place. These include:

- Whistleblower Policy,
- Whistleblower hotline,
- modern slavery training,
- a culture that does not tolerate modern slavery risks,
- internal modern slavery working group and,
- Senior Manager site visits.

Due diligence and supply partner pre-qualification processes

All subcontractors and suppliers 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 guides us to select business partners that follow workplace standards and business practices, consistent with those of Wiley.

Our subcontractor selection process includes a pre-qualification process to assess the competence and compliance of the partner with legal requirements, health and safety standards, environmental requirements, and professional competence. Subcontractors and 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. This 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.

Whistleblower Policy and anonymous Whistleblower Hotline

In FY25 Wiley updated its Whistleblower Policy and introduced a new mechanism for internal and external parties to report potential or actual issues through an independent and anonymous whistleblowing service. This action was completed as planned last year and described in the FY24 Modern Slavery Statement.

Wiley is committed to doing business in an open, ethical and accountable way, and to supporting a culture of integrity in everything we do. An important aspect of this is that individuals feel confident about reporting any concerns they may have about wrongdoing in relation to our business activities.

Wiley's Whistleblower Policy, reviewed and approved by the Managing Director and Board, outlines clear protections and procedures for raising concerns, including modern slavery risks. The policy now includes a third-party reporting service, [Integrity Line](#), enabling anonymous disclosures and supporting safe, accessible grievance mechanisms aligned with international human rights standards.

Modern Slavery Working Group

Wiley has established a cross-functional Modern Slavery Working Group as a key control to identify, assess, and mitigate modern slavery risks across the business. The working group meets quarterly and includes representatives from finance, risk, commercial, and operations. The working group plays an active role in reviewing risk assessments, overseeing control effectiveness, and driving continuous improvement.

Modern slavery training

In October 2025 Wiley delivered company-wide modern slavery training at its Town Hall, which all employees attend. A tailored presentation was used that addressed the specific risks relevant to the construction sector and Wiley's operations. The session featured a real-life chocolate case study, an interactive quiz, and accessible materials. This made the content engaging and practical for all employees.

Updated Subcontract Agreements to incorporate modern slavery requirements

Wiley has updated its standard Subcontract Agreements with special conditions to communicate modern slavery legislation and subcontractor obligations. These updates strengthen contractual expectations around labour practices, supplier due diligence, and cooperation with any processes related to modern slavery concerns.

Other strategies and actions taken

During FY25 additional activities were undertaken as we evolve our approach to assessing and addressing modern slavery risks in our business. These activities included:

- Further developing the Wiley business performance review, training and competency framework.
- Engagement of third-party advisors in the review of Wiley human resources arrangements and ensuring the compliance of employee agreements with the relevant Award and local legislation.
- Ongoing refresh of safety management system and integrated 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. This enables all workers to have easy access to safety policies, procedures and forms online.
- Implementation of Industry best practice and widely used project management software, Procore, across active project delivery sites. This enables all workers to have easy access to information they need to complete their work tasks.



How the effectiveness of our actions is assessed

Wiley assesses the effectiveness of the actions it is taking to address modern slavery risks in its business and supply chain using the following three metrics with our results for FY25 (the first year of measurement) shown in the table below.

MODERN SLAVERY EFFECTIVENESS METRIC	FY25 RESULT
Commercial Manager recruited who is dedicated to operational risk management across the business	Yes
Independent whistleblower hotline in place (and number of whistleblower reports)	Yes (Zero)
Residual risk rating based on modern slavery risk register and risk management tool	Low

Wiley acknowledges that it did not meet Mandatory Criteria (e) of the Modern Slavery Act in FY24, to describe how Wiley assesses the effectiveness of the actions being taken to assess and address the risk. Wiley is committed to annual reporting of its progress across the three metrics described above in its annual Modern Slavery Statement. In FY26 Wiley plans to expand the metrics to include:

- Percentage of subcontractors with signed subcontracts including modern slavery,
- Number of Modern Slavery Working Group meetings held,
- Percentage of employees who have undertaken modern slavery training, and
- Percentage of sites using HammerTech safety management software and Procore project management software.

Governance approach and risk management strategy

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.

Wiley has no tolerance to slavery in all its forms. Wiley's governance approach and risk management strategy are designed to reduce the risk and the prevalence of modern slavery.



CONTINUOUS IMPROVEMENT

Wiley recognises the continuing evolution of supply chain management in managing the risks of modern slavery. The business is continually improving how it 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.

Consultation and engagement

In order to prepare this joint statement, Wiley engaged with each of the reporting entities covered by this statement and consulted with all the entities we own or control.

Engagement included input from representatives across our commercial, finance, risk, and operations teams. This ensures the statement reflects shared understanding of modern slavery risks and the actions taken across the group.

Looking ahead Wiley continues to evolve our approach to identifying, mitigating, and managing the risks of modern slavery. Over the next 12-24 months, we are focused on the following activities:

- Measure and report on the percentage of subcontractors with signed subcontracts including modern slavery clauses.
- Continue to support operational and strategic risk management across the business.
- Continue training and education for employees and our supply chain to address modern slavery risk factors.
- Further develop the modern slavery risk assessment framework.
- Measure and report on the percentage of sites using HammerTech safety management software and Procore project management software.
- Review Australian small businesses payment terms to help with cash-flow for the smaller businesses we engage.



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 15 December 2025 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.

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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WILEY

A family owned company for over 100 years