Slavery & Human Trafficking Policy

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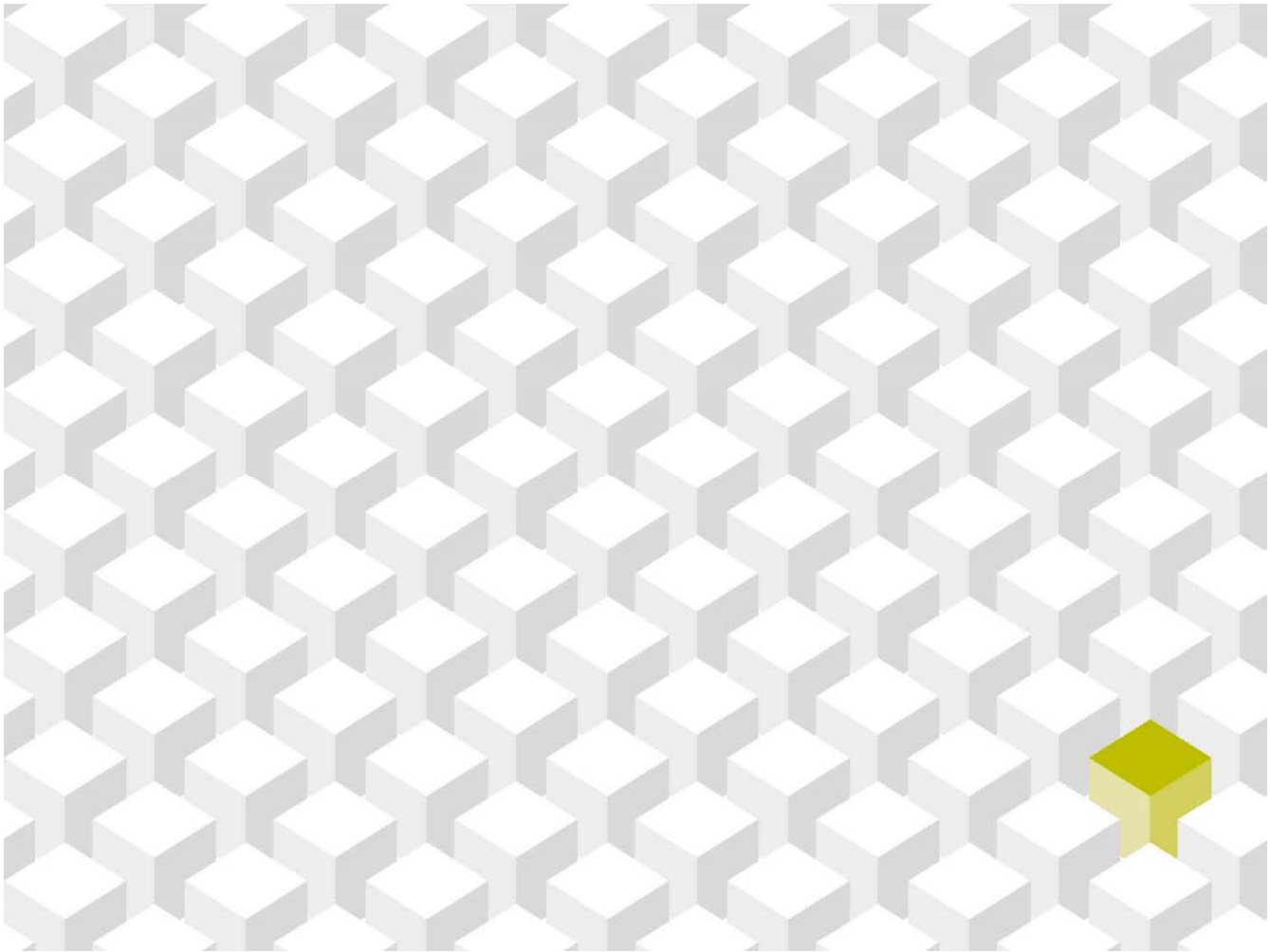

The Modern Slavery Act of 2015 requires certain businesses to provide disclosure concerning their efforts, if any, to address the issues of slavery and human trafficking in their supply chains. The disclosures are intended to provide clients with the ability to make better, more informed choices about the company which they support.

Western Building Systems is committed to maintain and improving systems and processes to avoid complicity in human rights violations related to our own operations and that of our supply chain. Western Building Systems recognises that slavery and human trafficking can occur in many forms. Therefore, throughout this disclosure we use the terms “slavery and human trafficking” to encompass various forms of coerced labour.

Our commitment to human rights is outlined in our Code of Conduct. We have a commitment to improve and implement the Code of Conduct across our supply chain.

Western Building Systems takes steps to verify, evaluate and address risks of slavery and human trafficking in our supply chain. The first step in this process is to set clear expectations for our suppliers. Our Code of Conduct states “We do not tolerate forced, debt bonded, indentured labour practices or human trafficking. Western Building Systems does not allow harsh or inhumane treatment, including corporal punishment or the threat of corporal punishment….. We expect our suppliers and others to meet these expectations”. Our Code on Conduct also, in turn, provides that “forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery or trafficking of persons shall not be used”.

We regularly notify our suppliers of their obligation to comply with our Code of Conduct. Our verification process involves an assessment of our suppliers, who are required to complete a self-assessment questionnaire, including questions targeted at slavery and human trafficking risk. Western Building Systems uses this questionnaire to determine the risk profile of suppliers for environmental, safety, human rights (including slavery and human trafficking) and other supplier sustainability issues.

In addition to this self-assessment questionnaire, we utilise a more detailed survey that covers slavery and human trafficking risks targeted at those companies that we consider higher risk.

We view assessments and audits as integral parts of our overall supply chain management process. They help us identify compliance gaps where immediate action is needed, and root causes that enable development of systemic solutions and improvements.

Western Building Systems’ Managing Director sets the tone of our ethical culture and holds management accountable for communicating ethics and compliance expectations. Each year our Managing Director communicates with employees and senior managers regarding the importance of ethics and legal compliance. We believe that this “message from the top” along with ethics and compliance training

and regular communication throughout the year, helps to create an ethical and legally compliant culture within the business.

Through our Code of Conduct (which contains specific information on slavery and human trafficking) we seek to promote honest and ethical conduct, deter wrongdoing and support compliance with applicable laws and regulations. The principles embodied in our Code of Conduct reflect our policies related to but not limited to slavery, human trafficking, conflicts of interest, and non-discrimination, antitrust, anti-bribery, and anti-corruption and protecting our company's reputation.

The Code of Conduct directs employees to consider short-term and long-term impacts on human rights and the community when making business decisions, and to report potential issues as soon as they are identified.

We encourage anyone (including employees, sub-contractors, suppliers and clients) to report in good faith any issues or concerns about potential ethics, human rights, legal or regulatory violations, including improper or unethical business practices such as fraud or bribery.



Rory McGuigan
Managing Director
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