

Modern Slavery and Human Trafficking Statement 2023

This statement covers the activities of: -

- W&S Plastics Pty Ltd
Australian Business Number 58 001 566 981
37 – 39 Seton Rd,
Moorebank NSW 2170
Australia
- W&S Plastics (Malaysia) Sdn Bhd
Company ID 1166695-W
No. 62, Jalan Ipark 1/1
Kawasan Perindustrian Ipark,
81000 Bandar Indahpura,
Kulai, Johor
- W&S Plastics (Singapore) Pte Ltd
Company ID 201305343D
37 – 39 Seton Rd
Moorebank NSW 2170
Australia

This statement seeks to understand and implement actions to minimise the risk of modern slavery and human trafficking in our operations and supply chain.

Introduction

This is the first Modern Slavery Statement (“Statement”) for the W&S Plastics group, as informed by the Australian Federal Modern Slavery Act 2018.

Under the terms of the act, the W&S Plastics group is not required to make this statement as our annual revenue does not meet the criteria. This voluntary statement is prepared by the business as good corporate citizens.

The purpose of this statement is to outline our approach to ensuring that W&S Plastics has robust frameworks and processes in place to minimise the risk of modern slavery in our business operations and supply chain.

We recognise that slavery and human trafficking can occur in many forms, as considered in the Act. This can include slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

W&S Plastic will not:

- Employ a person under the age for completing compulsory schooling in the region of employment,
- Allow a person under the age of 18 years to perform work that is hazardous to their physical, mental or moral well-being including work that takes place under particularly difficult conditions such as work for long hours or during the night.
- Withhold worker identity or immigration documents

W&S Plastics is fully committed to operating responsibly and establishing and adhering to the highest ethical standards across our group. We will not tolerate any forms of slavery or human trafficking in our business.

We support the United Nations Sustainable Development Goals.

Our business

Since our inception in 1972, W&S Plastics has grown to become one of Australia's leading manufacturers of plastic inject moulded products supplying a wide variety of industries.

The group has about 150 employees.

W&S Plastics is a Wholly privately owned company and business activities are reported to the board of directors annually.

These reports are not published publicly.

Our structure, operations and supply chain

Business	Main operations	Supply chain
W&S Plastics	<ul style="list-style-type: none"> • The business operates in Sydney Australia manufacturing plastic injection moulded parts for <ul style="list-style-type: none"> ○ Medical devices ○ Electronics devices ○ Electrical ○ Telecommunications ○ Fluid transfer ○ Plumbing ○ Other • Sales and marketing • Finance • Technology and data • Commercial and governance 	<ul style="list-style-type: none"> • Materials required for the plastic injection moulding process <ul style="list-style-type: none"> ○ Tooling ○ Plastic resin ○ Packaging materials • Machinery required for the manufacture of plastic parts • Office consumables • Utilities and professional service consultants
W&S Plastics (Malaysia)	<ul style="list-style-type: none"> • The business operates in Johor Malaysia manufacturing plastic injection moulded parts for <ul style="list-style-type: none"> ○ Medical devices ○ Electronics devices ○ Medical diagnostics ○ Other • Sales and marketing • Finance • Technology and data • Commercial and governance 	<ul style="list-style-type: none"> • Materials required for the plastic injection moulding process <ul style="list-style-type: none"> ○ Tooling ○ Plastic resin ○ Packaging materials • Machinery required for the manufacture of plastic parts • Office consumables • Utilities and professional service consultants

W&S Plastics
(Singapore)

- The business entity operates in Singapore as a trading company
- The business is a platform for the purpose of trading the products manufactured by W&S Plastics and W&S Plastics (Malaysia)

- Plastic products manufactured by W&S Plastics and W&S Plastics (Malaysia)

Our approach

W&S Plastics Group has zero tolerance for any form of modern slavery-like practices.

Our General Managers report yearly to the Senior Management Team and subsequently through the Managing Director to the Board of Directors on activities conducted to ensure compliance with the Act.

Our policies and procedures

We have formal policies in place that are intended to promote ethical and legally complaint business conduct. Our policies contribute to our commitment to prevent violations of human rights such as forms of slavery in our business.

When onboarding new suppliers, our new projects and procurement teams assess the risk that they may introduce modern slavery in our operations and supply chain. Their recommendation for adopting a new supplier is made to the General Manager of each plant to make the final decision. The group will not adopt a new supplier that has been identified as posing any risk of using modern slavery practices.

The above procedure is reviewed annually by the Senior Management team to ensure that our process is robust and minimises the risk of modern slavery in our operations and supply chain.

Potential risks in our operations and supply chains

Our Australian and Malaysian plants are operated under the umbrella of state and federal industrial relations laws which regulate employee provisions such as rates of pay, hours of work, leave entitlements etc. There are penalties for breaching these laws however; W&S group adopt a higher moral and ethical standard than these laws require to ensure that employees and contractors are treated with compassion and are provided with the freedoms expected of the countries in which we operate.

Third party labour providers have been identified as a risk but our plants did not use any during the statement period and there is no plan to use any in the near future.

On site contractors such as cleaners and security present a risk and as such our staff has been trained to monitor contractors to attempt to determine if they are being exploited.

W&S group has been able to identify other areas of risk within our supply chain such as the unskilled labour used by tooling manufacturers, pressed metal manufactures, electrical sub-assemblies and packaging materials.

We do not have the resources to audit our suppliers for compliance so we rely on an annual questionnaire sent to all major suppliers to determine if they meet with requirements of the Act.

We will use these potential risk scenarios to prioritise our supplier engagement activities over the next financial year (FY2021). In addition, we have already been working on improving our processes such as reviewing our Supplier Engagement Principles and supplier on-boarding approach.

We will monitor the effectiveness of our processes and adjust them and our training procedures to drive continuous improvement.

Future commitments

Over the next year, our key focus areas will be:

- Reviewing and updating our risk-related policies and control measures;
- Delivering appropriate awareness training to our stakeholders;

Andrew Wiseman

Managing Director