Modern Slavery Statement 2026

Submitted by Wilson Transformer Company Pty Ltd (ABN 004 216 979)
310 Springvale Road, Glen Waverley, Victoria, 3150

Our Organisation

Established in 1933 with a proud history, Wilson Transformer Company Pty Ltd ("**WTC**") is a leading specialist in the delivery of transformer solutions. From our manufacturing base in Australia with Sales and Support offices internationally, we deliver solutions to a wide variety of industries and customers around the world. As a transformer solution specialist, we offer our customers the confidence of highly experienced experts in the sales, design, procurement, manufacture, factory acceptance testing, delivery, site assembly, and life management services of power transformers, distribution transformers, compact MV substations, special transformers and special applications.

WTC Framework to Combat Modern Slavery

WTC and its people demonstrate care for each other, the environment, our customers, suppliers and the wider community. We all have a responsibility to be alert to the risks in our business and in our supply chain.

WTC maintains a zero-tolerance approach to any form of slavery, servitude, forced or compulsory labour, or human trafficking in its operations. All members of WTC are expected to maintain the utmost standards in conformity with this approach and we expect all our supply chain partners and contractors to comply with these same values.

The prevention, detection and reporting of human rights violations in any part of WTC's business or it's supply chain partners is the responsibility of all WTC employees and supply chain partners. The WTC executive leadership team oversee WTC's commitment to preventing modern slavery and work closely with Committees, Department Heads and Supply Chain teams to uphold this commitment.

Risks of Modern Slavery Practices in WTC's Operations and Supply Chain

The Workforce

We believe WTC's operations have a lower risk for modern slavery because WTC has direct control over its operations. All employees receive a thorough induction process on the WTC Code of Conduct, with an emphasis on behaving ethically in alignment with our core values.. To help identify any issues that may arise, WTC employees are encouraged to raise their concerns with Management or raise an issue under the whistleblowing policy.

Supply Chain Partners

We believe WTC's supply chain is the primary risk for modern slavery, as it has less control over and visibility into its supply chain activities in comparison to its operations.

WTC's supply chain includes the sourcing of materials and components principally related to the manufacture of its products from companies around the world, including countries and industries where the risk of modern slavery may exist.

As part of our initiative to identify and mitigate supplier risk, we at WTC:

- adhere to a risk methodology approach in selecting and evaluating new and existing suppliers;
- maintain control of our own purchasing to ensure optimum control of the work environment; and
- invest in long-standing relationships with suppliers, procuring locally where possible, and make clear our expectations of business behaviour.

Supply Chain Due Diligence & Management Process

We are continually improving the process of updating WTC's supplier selection and monitoring process to help identify modern slavery risk amongst WTC's suppliers. This includes:

- Updating the WTC Code of Conduct to include: (i) WTC's zero tolerance approach to human rights violations and the expectations of employees to uphold that approach, including ensuring that WTC does not do business with organisations or individuals that it knows, or suspects, are not upholding generally accepted human rights standards, and (ii) a formal procedure for employees to raise human rights concerns within the organisation;
- updating WTC's standard terms and conditions to legally bind suppliers to commit to preventing modern slavery as well as complying with all relevant laws;
- expanding the Supplier Evaluation Questionnaire to include more detail on control mechanisms and processes to protect human rights and prevent modern slavery. The completion of these questionnaires by suppliers will allow WTC to rate each supplier's modern slavery risk;
- requiring suppliers to sign a WTC Supplier Code of Conduct, setting out WTC's expectation that its suppliers comply with the principles set out in the Code of Conduct, and applicable laws. These principles include ensuring: a safe and healthy working environment; that wages, benefits, working conditions and protections comply with local laws and regulations; they are not causing or contributing or directly linked to any human rights abuses, including child labour, modern slavery, discrimination or harassment; the highest standards of integrity in all business interactions, including that suppliers must not engage in any form of bribery, corruption, extortion or embezzlement; and an expectation that suppliers will cascade these principles to their own suppliers to ensure alignment across the supply chain;
- continually monitoring at risk suppliers and where appropriate, formally auditing suppliers, either on-site or remotely, for their compliance with the WTC Supplier Code of Conduct; and
- all relevant WTC teams working collaboratively to reviewing existing policies and risk management processes.

WTC will not procure goods or services from a supplier that is known to engage in modern slavery practices.

Reporting Breaches of Modern Slavery Act

If any individual, supplier or any other organisation has evidence of modern slavery in WTC's operations, they are encouraged to contact WTC at corporate@wtc.com.au or the WTC Privacy Officer at privacy.officer@wtc.com.au. Reports will be investigated, and appropriate action will be taken. For any supplier that is found to be non-compliant with WTC's Supplier Code of Conduct, WTC will, where possible, terminate the relationship unless conditions are improved and compliance is restored. WTC's supply chain monitoring activities do not extend to sub-suppliers. WTC relies on suppliers to monitor sub-suppliers for compliance with its policies.

Effectiveness of Actions

We monitor the effectiveness of WTC's policies and procedures through our internal reporting procedure, and internal and supplier audits. In 2024, no modern slavery issues were reported or identified.

Consultation

This statement is made pursuant to Part 2 of the Modern Slavery Act 2018 and constitutes WTC's slavery and human trafficking statement for the financial year 2024/25. WTC will maintain these principals and initiatives into the future.

This statement has been reviewed and approved by the Board of Directors of Wilson Transformer Company Pty Ltd and is signed by the Managing Director on behalf of the organisation.

Ed Wilson, Managing Director