



# SGH

Industrial Services, Media, Energy and Investments

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## FY23 Modern Slavery Statement





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## Corporate Directory

Head Office and Registered Office  
Seven Group Holdings Limited  
ABN: 46 142 003 469  
Level 30, 175 Liverpool Street  
Sydney NSW 2000  
02 8777 7574

Key Operating Businesses  
WesTrac WA  
128–136 Great Eastern Highway  
South Guildford WA 6055  
08 9377 9444

WesTrac NSW  
1 WesTrac Drive  
Tomago NSW 2322  
02 4964 5000

WesTrac ACT  
78 Sheppard Street  
Hume ACT 2620  
02 6290 4500

Allight  
12 Hoskins Road  
Landsdale WA 6065  
08 9302 7000

Sykes Group  
42 Munibung Road  
Cardiff NSW 2285  
02 4954 1400

Coates – East Business Unit  
6 Greenhills Avenue  
Moorebank NSW 2170  
13 15 52

SGH Energy  
Level 4, 160 Harbour Esplanade  
Docklands VIC 3008  
03 8628 7277

Boral  
Level 3, Trinita 2  
39 Delhi Road  
North Ryde NSW 2113  
02 9220 6300

Coates – Head Office  
Level 6, 241 O’Riordan Street  
Mascot NSW 2020  
13 15 52

Coates – East Business Unit  
6 Greenhills Avenue  
Moorebank NSW 2170  
13 15 52

Coates – South Business Unit  
120 South Gippsland Highway  
Dandenong VIC 3175  
13 15 52

Coates – North Business Unit  
56–61 Meakin Road  
Meadowbrook QLD 4131  
13 15 52

Coates – West Business Unit  
18 Wheeler Street  
Belmont WA 6104  
13 15 52

## Introduction

Seven Group Holdings Limited (SGH) is a leading diversified Australian operating group, with holdings across industrial services, construction materials, energy, and media. SGH is committed to minimising Modern Slavery risk, and actively engages with employees, suppliers, and stakeholders to promote lawful and ethical practices throughout its supply chains and operations.

This Joint Modern Slavery Statement is made on behalf of SGH and its majority-owned subsidiaries for the year ended 30 June 2023. The statement aligns with the Australian Commonwealth Modern Slavery Act 2018, and outlines the measures undertaken to assess and mitigate Modern Slavery risks within the Group's operations and supply chains over the reporting period.

## Reporting Entity

Seven Group Holdings Limited (ABN 46 142 003 469) is registered at Level 30, 175 Liverpool Street, Sydney NSW 2000. The table below provides an overview of the Group's structure:

This Statement focuses on the following wholly/majority entities:

- WesTrac Pty Limited (wholly owned) – ABN 63 009 342 572
- Coates Group Holdings Pty Limited (wholly owned) – ABN 85 126 069 341; and
- Boral Limited (71.6 per cent owned) – ABN 13 008 422 761

Boral is incorporated into the Group's Statement as a material entity, as SGH consolidates its earnings and has a majority ownership in the business. In line with best practice, these businesses have also prepared individual Modern Slavery Statements, which are available on their respective websites.

The Audit & Risk Committee oversees the Group's response to Modern Slavery risks. The Group has published its standalone [Modern Slavery policy](#), formalising its approach to addressing Modern Slavery risk. The Group's Modern Slavery Policy is supported by a robust governing framework, outlined in the SGH [SGH Corporate Governance Statement 2023](#).

## Operations

The Group's operations over the reporting period were concentrated in Australia. Detailed information on each business can be found on the Group's website, [www.sevengroup.com.au](http://www.sevengroup.com.au), and in the latest (FY23) [Annual Report](#). A high-level operational summary of the majority owned businesses relevant to this disclosure is outlined below.

### WesTrac

WesTrac is the sole authorised dealer of Caterpillar equipment in WA, NSW and the ACT, operating from 28 branches. As of 30 June 2023, WesTrac employed ~4,400 people, including team members on common law contracts, enterprise bargaining agreements, and through labour hire.

With a substantial geographical footprint and a diverse client base, WesTrac offers customers a wide range of Caterpillar earthmoving machinery and construction equipment, providing responsible finance options and comprehensive whole-of-life management solutions.

### Coates

Coates Group comprises two equipment hire companies, Coates and PT Coates Hire Indonesia (PT Coates), that operate throughout Australia and Indonesia, respectively. Coates is Australia's leading equipment hire and solutions provider, serving clients across engineering, resources, infrastructure, manufacturing, construction, agriculture, major events, and more. Coates Group employs ~2,200 staff across 145 metropolitan, regional, and remote branches across Australia, along with five branches operating in Indonesia.

### Boral

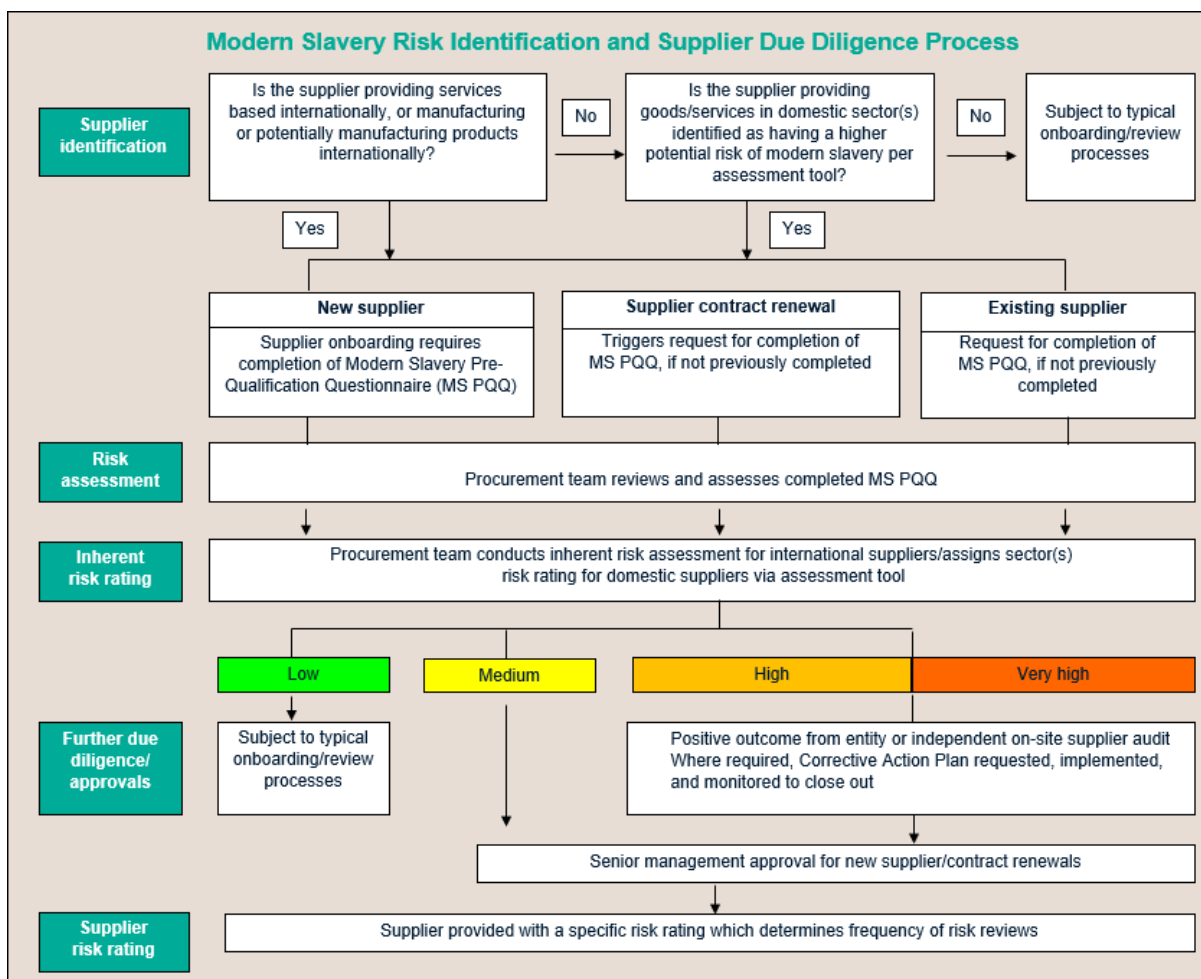
Boral is Australia's largest integrated construction materials company, producing and selling a broad range of products. The business's core operations comprise: Quarries, Cement, Asphalt, Concrete and Placing, and Recycling, over a network of 360 operating sites. As of 30 June 2023, Boral had ~4,700 full-time equivalent employees.

## Modern Slavery Risks in Supply Chains and Operations

SGH operates across multiple sectors and acknowledges the risk of Modern Slavery in its supply chains and, to a lesser extent, operations. Each business unit periodically reports its key risks to the Audit & Risk Committee, which includes a bi-annual questionnaire on Modern Slavery risks.

### Supplier Modern Slavery Due Diligence

The majority of the Group’s procurement in FY23 originated from Caterpillar, domestic Australian suppliers, and domestic labor governed by Australian employment law. Despite these relatively low-risk sources, the Group continues to implement its Modern Slavery risk identification and supplier due diligence approach across both new and existing suppliers, as outlined below.



### Awareness and Training

SGH provided comprehensive Modern Slavery training to its relevant Procurement teams over the reporting period. The training focused on Modern Slavery supplier risk identification, due diligence processes, and incident reporting and investigation.

### WesTrac Risks

WesTrac conducted a thorough assessment of Modern Slavery risk within its operations in FY23, determining it to be low. However, the company recognises a heightened risk in the operations of service labor hire providers, contract services, and international recruitment providers. Accordingly, this was the focus of the FY23 review. Caterpillar has undergone its own due diligence to investigate Modern Slavery risks in its supply chains, and has published its own [Australian Modern Slavery Statement](#).

86.5% of WesTrac's workforce is directly employed, adhering to Australian laws and enterprise agreements. The remaining 13.5% are engaged indirectly through labor hire and contract service providers, with WesTrac mandating that these providers comply with all applicable laws.

The Modern Slavery risk associated with goods sourced from Caterpillar is deemed low. Caterpillar has a comprehensive supplier due diligence process and publishes its own Slavery and Human Trafficking Statement, Australian Modern Slavery Statement, and Human Rights Policy. The Modern Slavery risk associated with non-Caterpillar suppliers was also assessed as being low.

### **Coates Risks**

Coates assessed and found negligible risk of Modern Slavery in its labour hire practices in FY23. The business encourages all stakeholders to report policy and legislation breaches through its Whistle-Blower policy, including Modern Slavery practices.

Coates considers the risk of Modern Slavery in its direct supply chain to be low, supported by its monitoring efforts and assessments of supplier networks, continuously reviewed contractual terms, onboarding processes and remediation activities.

The majority of Coates product purchases relate to equipment sourcing, with a growing portion sourced from high-quality manufacturers in China. In FY23, Coates explored whether machines manufactured in certain locations in China have a higher risk of Modern Slavery. The assessment found that equipment purchased by Coates is produced in provinces with reduced Modern Slavery risk, by organisations with sound policies and firm commitments to the eradication of Modern Slavery.

A further deep dive survey for the FY23 statement found no Modern Slavery practices in the equipment procurement of Coates' supply networks.

Some products and services such as IT hardware and solar panels, are not part of Coates' direct supply chain, as they are acquired through third party distributors. Coates reviewed the policies and Modern Slavery statements of these distributors, as well as performing adverse media monitoring, with no evidence of Modern Slavery uncovered.

### **Boral Risks**

Boral assessed its Modern Slavery risk as low in FY23. The business has robust HR controls, covering recruitment, onboarding, wage reviews, and payment verification, ensuring it complies with all relevant labor laws.

Boral utilises a Modern Slavery Supplier Risk Profile Assessment (MSSRPA) tool to conduct risk assessments on its suppliers. The MSSRPA tool assigns an inherent risk rating to suppliers, based on the risk of Modern Slavery practices in the jurisdictions and industry sectors in which they operate.

The majority of Boral's international suppliers provide the company with products, plant, or equipment sourced from natural resources or mining and manufacturing industries, which are considered high-risk industry sectors.

The sectors of cleaning and security guarding services in Australia are also deemed higher risk, as they employ a high percentage of migrant workers, who are more vulnerable to cases of forced labor exploitation. Each of these higher-risk sectors is incorporated into Boral's MSSRPA tool.

### **WesTrac Actions Taken**

WesTrac implemented several initiatives in FY23 to control the risk of Modern Slavery within its operations and supply chains, including:

- Employee training: Training was held to assist in the early identification of Modern Slavery in supply chains. The learnings from each year's reviews and actions are cascaded throughout the business through this process.
- New supplier checks: Due-diligence checks were undertaken on all new suppliers to ensure they share WesTrac's ethics and values, and have appropriate processes and controls in place to control Modern Slavery risks. Checks are dependent on the nature and location of the supplier, as well as the services provided.
- Existing supplier checks: WesTrac introduced periodic due diligence checks for existing vendors to ensure they continue to remain compliant post onboarding.

### **Coates Actions Taken**

In line with commitments from the previous statement, in FY23 Coates:

- Conducted a deep dive into 20 of its top suppliers with elevated country and/or commodity-based Modern Slavery risks. None of these suppliers were found to have instances of Modern Slavery in their networks in the previous ten years, as demonstrated by physical inspections of

manufacturing sites for two thirds of suppliers interviewed. The remaining third of suppliers interviewed were aiming to implement physical inspections in the near future.

- Assessed a Tier Three supplier manufacturing solar panels in China that were being installed at selected Coates sites through an Australian renewable energy company.
- Reviewed allegations of a Tier Two supplier manufacturing equipment parts in an area of China flagged with a higher risk of Modern Slavery practices. During its investigations, Coates Group did not find any evidence of any suppliers engaging in Modern Slavery practices.

### **Boral Actions Taken**

Boral's approach to assessing and addressing Modern Slavery is underpinned by robust corporate governance, along with policies, standards and procedures that provide a clear framework for managing Modern Slavery risk in the business.

Specific actions taken in FY23 to combat Modern Slavery risk include:

- All members of Boral's procurement team completed refresher training on Modern Slavery, with the program also built into the induction program for relevant new employees.
- Running of a cross-functional working group that guides, monitors and reviews work undertaken to strengthen Boral's approach to Modern Slavery risk.
- Review and update of the MSSRPA tool, reassessing risk levels across operations and supply chains, evaluating procedures, processes and controls.
- Updated standard procurement contracts, ensuring expectations for Modern Slavery compliance were incorporated in each supplier's obligations.

### **Assessing Effectiveness**

The effectiveness of Modern Slavery processes at each of the Group's majority-owned businesses is continuously monitored and reviewed by their respective Modern Slavery steering and risk committees. Deficiencies or improvements are addressed as they arise, and opportunities for continuous improvement are identified and executed.

## **Consultation**

The Modern Slavery Working Groups at each of the Group's businesses engage with industry experts when appropriate, to keep abreast of learnings and evolving good practice for reducing and managing Modern Slavery risk.

Though WesTrac, Coates and Boral's disclosure obligations are satisfied by this Joint Statement, for best practice purposes, each has published standalone statements that have been approved by their respective management teams and Boards. These statements provide additional detail and insight into their Modern Slavery risk management practices and can be accessed via the following links:

- [WesTrac Statement](#)
- [Coates Statement](#)
- [Boral Statement](#)

This Statement has been authorised by the Board of Seven Group Holdings Limited.



Ryan Stokes AO  
Managing Director & Chief Executive Officer  
19 December 2023