

MODERN SLAVERY STATEMENT 2024

 **estpac** GROUP

WESTPAC BANKING CORPORATION
ABN 33 007 457 141

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Acknowledgement of Indigenous Peoples

Westpac acknowledges the First Peoples of Australia. We recognise their ongoing role as Traditional Owners of the land and waters of this country and we pay our respects to Elders, past and present. We extend our respect to Westpac's Aboriginal and Torres Strait Islander employees, partners and stakeholders, and to the Indigenous Peoples in the other locations where we operate.

We also acknowledge the Indigenous Peoples in Aotearoa (New Zealand), referred to as tāngata whenua, and the unique relationship they share with all New Zealanders under Te Tiriti o Waitangi.



Westpac's sustainability reporting suite and disclosures

Our reporting suite brings together the Group's financial, non-financial, risk and sustainability performance for the year. It includes our Annual Report, Presentation and Investor Discussion Pack, Pillar 3 Report, Corporate Governance Statement and Climate Report. We also publish other sustainability reports and disclosures such as our [**Safer Children, Safer Communities Impact Report**](#) and our [**Human Rights Position Statement and Action Plan**](#).

Our full reporting suite is available online at westpac.com.au/about-westpac/investor-centre/annual-report/.

Navigating this report:

External links are indicated bold and underlined. All data is for the 12 months ended 30 September 2024, and all dollar amounts are in Australian dollars unless otherwise indicated.



[**Annual Report**](#)

[**2024 Sustainability Index and Datasheet**](#)

[**2024 Climate Report**](#)

About this Statement

This Modern Slavery Statement (Statement) is the Westpac Group's¹ and the BT reporting entities' (defined below) response to the Australian *Modern Slavery Act 2018* (Cth) (Australian Modern Slavery Act) and *Modern Slavery Act 2015* (UK) (UK Modern Slavery Act)² for the period 1 October 2023 to 30 September 2024, our financial year (FY24).³ This is a joint Statement made on behalf of the following reporting entities:

- Westpac Banking Corporation (ABN 33 007 457 141) and a number of its owned and controlled entities which are also reporting entities under the Australian Modern Slavery Act (listed in *Section 6 – Reporting entities and approval*); and
- BT Funds Management Limited (ABN 63 002 916 458) (BTFM) and BT Portfolio Services Ltd (ABN 73 095 055 208) (BTPS), and the trusts for which BTFM and Westpac Financial Services Limited (ABN 20 000 241 127) (WFSL) are the trustee which are reporting entities under the Australian Modern Slavery Act (listed in section 6) (collectively the BT reporting entities).

This Statement sets out the modern slavery risks of, and actions taken to manage those risks by, the reporting entities and their owned and controlled entities in the reporting period.

For approvals refer to *Section 6 – Reporting entities and approval*.

1. In this Statement a reference to 'Westpac', 'Group', 'Westpac Group', 'we' and 'our' is to Westpac Banking Corporation ABN 33 007 457 141 and identified reporting entities set out in *Section 6*, including the BT reporting entities. Any reference to Westpac Banking Corporation is a reference to that entity only.
2. Westpac Banking Corporation ABN 33 007 457 141 is the only reporting entity for the purposes of the UK Modern Slavery Act.
3. In this Statement a reference to 'the year', 'this year' and 'reporting year' is to FY24 (1 October 2023 to 30 September 2024) unless otherwise specified.

Mandatory reporting criteria of the Modern Slavery Act

This Statement was prepared to meet the mandatory reporting criteria set out under the Australian Modern Slavery Act. The table below identifies where each criterion of the Act is addressed within this Statement.

Australian Modern Slavery Act Mandatory Criteria	Reference in this Statement
Identify the reporting entity	Pages 33–34
Describe the structure, operations and supply chain of the reporting entity	Pages 6–9
Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity, and any entities that the reporting entity owns or controls	Pages 10–27
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Pages 10–27
Describe how the reporting entity assesses the effectiveness of such actions	Pages 30–32
Describe the process of consultation with any entities that the reporting entity owns or controls	Pages 33–34
Any other information that the reporting entity considers relevant	Message from the CEO (page 3)
	Our commitment (pages 4–5)
	Grievance mechanisms and remedy (pages 28–29)



MESSAGE FROM THE CEO

In my first year as CEO, I endorse Westpac's long commitment to conducting our business in a way that respects human rights.

During FY24, we enhanced our response to modern slavery through ongoing integration of our human rights approach, including identifying the most significant areas of risk to people across our lending portfolio and supply chain, enhancing our grievance mechanisms and deepening our understanding of how intersectional issues such as those related to climate change, transition risk and the environment, may affect vulnerable groups.

We continued to strengthen our understanding of high risk sectors of our supply chain, uplifted our financial crime standards and how we take action on suspected modern slavery offences, and provided training to our employees to better identify and manage these risks.

Our commitment to respecting human rights has been shaped by internationally recognised human rights principles and is supported by our ongoing engagement with key stakeholders, including our participation in forums such as the UN Global Compact Network Australia. These collaborations help us to continuously refine how we monitor and manage human rights and modern slavery risks.

I am pleased with the progress we have made. I remain committed to transparency and accountability, as demonstrated by our reporting under both the Australian and UK Modern Slavery Acts.

Anthony Miller
Chief Executive Officer

1. OUR COMMITMENT TO HUMAN RIGHTS AND CONTINUOUS IMPROVEMENT



Our [Human Rights Position Statement and Action Plan](#) sets out our commitment and approach to respecting and advancing human rights. This includes our respect for internationally recognised human rights⁴, including the rights to freedom from slavery and to just and favourable conditions of work. It provides a lens through which Group policies, frameworks and strategies should be applied and sets expectations for our people and business partners (including customers and suppliers).

As we take an integrated approach to human rights, our [Human Rights Position Statement and Action Plan](#) also informs our approach to identifying and addressing modern slavery risks and impacts, for example through due diligence processes which allow us to focus and prioritise action on the most significant areas of risk to people.

4. This includes respect for internationally recognised human rights as set out in the International Bill of Human Rights and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.

OUR HUMAN RIGHTS POSITION

Our core human rights commitments include:

Human rights due diligence

Undertaking ongoing human rights due diligence to identify, prevent, mitigate, and account for our human rights risks and impacts.

Grievance mechanisms and remedy

Providing or participating in effective grievance mechanisms and providing for or cooperating in the remediation of adverse human rights impacts where we identify that we have caused or contributed to these impacts, recognising that we may be able to play a role in remedying abuse and violations, where we have not caused or contributed to an adverse impact, but are directly linked to it.

Advancing human rights

Identifying opportunities to support and promote human rights.

Building capability

Building human rights awareness and the knowledge and capabilities of our people, as relevant to their roles.

Upholding higher standards

Setting expectations through our Code of Conduct that our company and our people comply with laws and policies some of which incorporate protection of human rights and labour rights. If there is a direct conflict between an applicable domestic law and international human rights standards, we will look at ways to respect international human rights to the fullest extent possible.

Monitoring and communication

Tracking the implementation and effectiveness of our human rights commitments and approach and disclosing our progress and performance.

Stakeholder engagement

Seeking opportunities to engage and collaborate with stakeholders, including rights-holders, where possible and appropriate.

OUR PROGRESS AND THE ROAD AHEAD

Westpac has a long history of social impact and human rights leadership. In 2009 we became a founding member of the UN Global Compact Network Australia, and in 2015 we published our first Human Rights Position Statement.

We are proud of the progress made against our human rights and modern slavery actions and the outcomes they have achieved. However, there remains much to be done as we continue our work to evolve and strengthen our modern slavery approach. In addition to the actions we've taken in FY24, *Section 5 – Assessing the effectiveness of our actions and future focus* outlines the areas we will continue to focus on in FY25.

2015–2017

- **2015** First Human Rights Position Statement and Action Plan
- **2017** First Slavery and Human Trafficking Statement under the UK's Modern Slavery Act
- **2017** Introduced refreshed Responsible Sourcing Code of Conduct and Supplier Assessment
- **2017** Introduced processes to support the welfare of whistleblowers

2018–2020

- **2018** Joined United Nations Environment Programme Finance Initiative (UNEP FI) Principles for Responsible Banking
- **2018** First determined and reported on our 'salient human rights issues'
- **2018** Extended Responsible Sourcing Supplier Assessment to new market engagement activities and existing suppliers
- **2019** Centralised the way we investigate whistleblower concerns and introduced a new online system to simplify the user experience
- **2019** WNZL became the first bank to be accredited as a Living Wage employer in New Zealand
- **2020** Introduced the 'Safer Children, Safer Communities' work program

2021–2023

- **2021** First Modern Slavery Statement under the Australian Modern Slavery Act
- **2021** Child Safeguarding Position Statement published – a first for an Australian bank
- **2021** Conducted a deeper dive into the risk of forced labour arising out of a high-risk region through targeted engagement with customers and suppliers
- **2021–2023** Enhanced our ESG credit risk assessment process for our business, corporate and institutional customers
- **2021–2023** Strengthened our approach to identifying, assessing, mitigating and reporting financial crime risks, including modern slavery and child sexual exploitation
- **2022** Strengthened the child labour section of our Responsible Sourcing Assessment and launched a new digital platform for supplier risk assessments
- **2022** Integrated consideration for modern slavery in our Customer Vulnerability Standard, which sets out requirements to service vulnerable customers
- **2023** Launched our fourth Human Rights Position Statement and Action Plan, integrating our position on child safeguarding

OUR HUMAN RIGHTS ACTION PLAN

In addition to our progress outlined left, our [Human Rights Position Statement and Action Plan](#) outlines five areas of strategic focus through to 2026, which we have continued to progress as we seek to implement and align our human rights approach across the business.

Our plan	Progress to-date
Addressing our salient human rights issues	• Completed the first phase of a deep dive Human Rights Risk Assessment (HRRRA) to identify our salient human rights issues and better understand our human rights risks across our Australian, New Zealand and Pacific locations. This year, we focused on our lending portfolio and supply chain. Refer to <i>Deepening our understanding of our salient human rights issues</i> in <i>Section 3 – Our actions to identify, assess and address modern slavery risks</i> below.
Strengthening grievance mechanisms and approach to remedying human rights abuses and violations	• Developed internal guidance on effective human rights grievance mechanisms and remedy for use by owners of existing complaints mechanisms. • Conducted a deep dive assessment of our existing grievance channels against the UNGPs effectiveness criteria for non-judicial grievance mechanisms and identified opportunities to strengthen our existing grievance mechanisms. Refer to <i>Section 4 – Grievance mechanisms and remediation</i> below.
Supporting and advancing human rights through a just and inclusive transition	• Completed work through our HRRRA to mature our understanding of the risks climate change presents to individuals and communities and their human rights. For example in relation to modern slavery in the renewables supply chain or financial hardship associated with climate displacement or increased energy prices. In September 2024 we held a cross-divisional workshop to test and refine the scope of our role as a bank in addressing a just, inclusive and resilient transition and to identify potential forward-looking actions.
Strengthening our focus on child safeguarding	• Completed year four of the Safer Children, Safer Communities (SCSC) funding program and integrated 'Safety by Design' features into products for children and young people. Refer to our 2023 Safer Children, Safer Communities Impact Report for more information.
Strengthening the foundations of our human rights approach	• Incorporated the core commitments of our Human Rights Position Statement within our operational risk management and compliance system and supporting frameworks, policies and procedures, including our Financial Crime Risk Management Framework (FCRMF) and ESG risk assessment processes. • Piloted and continued to enhance our human rights impact monitoring and evaluation framework, focused initially on modern slavery. Refer to <i>Section 5 – Assessing the effectiveness of our actions and future focus</i> below.

2. OUR STRUCTURE, OPERATIONS⁵ AND SUPPLY CHAIN



ABOUT US

Established in 1817, Westpac provides banking and other financial services in Australia and New Zealand. As one of Australia's largest companies and employers, we recognise the important role we play in improving social, environmental and economic outcomes for Australians and New Zealanders. We are dedicated to serving our 13 million customers, helping them to build strong futures and navigate periods of change.

We are proud to contribute to Australia's prosperity through \$5.9 billion in salaries, \$5.7 billion in shareholder dividends, \$3.5 billion in cash taxes and levies and \$4.4 billion spent with suppliers inside Australia.⁶

Westpac Banking Corporation is the ultimate parent entity of the Group, which includes a number of subsidiaries. Its shares are listed on the securities exchanges in Australia (ASX) and New Zealand (NZX). More information in relation to Westpac's subsidiaries is set out in our 2024 Annual Report. Information about the reporting entities in the Group is set out in *Section 6 – reporting entities and approval* below.

5. In this Statement, the term 'operations' is used to refer to the activities undertaken to pursue our business objectives and strategy, consistent with the discussion of the term provided in the [Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities](#).

6. Refer to the 2024 Sustainability Index and Datasheet for details. The contracting entity may have Australian or New Zealand subsidiaries nominated as their business address within our Accounts Payable system, the data may not always accurately reflect where products and/or services are being manufactured or delivered from. Spend inside/outside of Australia or New Zealand is reported on this basis.

7. APRA Banking Statistics, September 2024.

8. RBNZ, September 2024.

We have 762 branches across Australia, New Zealand and the Pacific, including 111 co-located branches in Australia which support multiple brands.

Our products and services are delivered across the following segments:

Consumer

Provides a full range of banking products and services to customers in Australia. Products and services are provided through a portfolio of brands comprising Westpac, St.George, BankSA and Bank of Melbourne using digital channels, call centres, mobile bankers, branches and third-party brokers. It also includes the RAMS franchise business, which closed to new home loan applications in August 2024.

Business and Wealth

Provides banking products and services to customers in Business Banking, Wealth Management, Private Wealth and Westpac Pacific. Business Banking offers lending generally up to \$200 million in exposure, merchant services using eCommerce solutions and transaction banking services. Customers are categorised by commercial business, small to medium businesses and agribusiness. The segment includes Private Wealth, supporting the needs of high-net-worth individuals, as well as BT Financial Group (BT), which provides wealth management platform services. In October 2024, we entered into an agreement to sell the auto finance portfolio. Subject to regulatory approval, the sale is expected to be completed in the first half

of 2025. The segment operates under the Westpac, St.George, BankSA, Bank of Melbourne and BT brands.

Westpac Institutional Bank (WIB)

WIB services predominantly corporate, institutional and government customers through three areas of specialisation: Corporate and Institutional Banking (CIB); Global Transaction Services (GTS); and Financial Markets (FM). CIB uses dedicated industry relationships and specialist product teams to support customers' borrowing needs. GTS is responsible for the provision of payments and liquidity management solutions to WIB's customers and Westpac's domestic and international payments infrastructure. FM provides a range of risk management, investment and debt capital markets solutions to WIB customers and access to financial markets products for consumers and business customers. Customers are supported throughout Australia and via branches and subsidiaries located in New Zealand, New York, London, Frankfurt and Singapore.

Westpac New Zealand Limited (WNZL)

Provides banking and wealth products and services for consumer, business and institutional customers in New Zealand.

Group Businesses

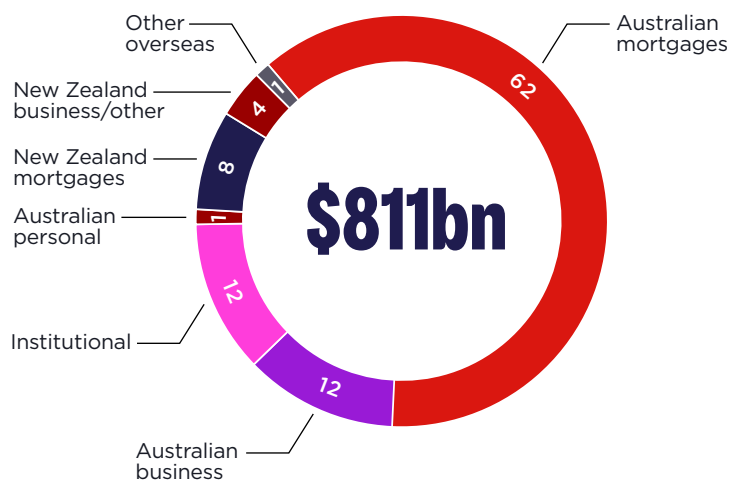
Includes support functions such as Treasury, Customer and Corporate Services. Technology, Finance, Human Resources, Legal and other Enterprise Services. It also includes Group-wide elimination entries arising on consolidation, centrally raised provisions and other unallocated revenue and expenses.



LENDING

Our Consumer, Business, WIB and WNZL segments support the flow of funds to our retail, small to medium business, commercial, corporate and institutional customers. The following provides a breakdown of our lending composition at 30 September 2024:

Composition of Gross Loans (% of total)



INVESTMENT PRODUCTS

BT Financial Group Australia (BT)

BT is a wealth management business offering access to managed funds and platform products (investment and superannuation) where customers can select their investments from a range of investment options (including term deposits, managed funds, managed portfolios and listed securities).

These products are distributed across a number of brands including Panorama and Asgard, and are available either directly to customers or through financial advisers.

The BT reporting entities sit within the Westpac Group and include BT Funds Management (BTFM), BT Portfolio Services (BTPS), BTFM as Trustee for Asgard Independence Plan - Division 2 and Westpac Financial Services Limited (WFSL) as Responsible Entity for BT Managed Portfolios. As at 30 September 2024, BT had 1,201 members of staff, with Westpac employing and managing them under a resource sharing deed.

BT New Zealand (BTNZ)

BTNZ is the investment business of Westpac in New Zealand. It is an indirect subsidiary of Westpac Banking Corporation, with no subsidiaries of its own. It offers managed funds primarily aimed at retail investments and is a government appointed default KiwiSaver provider. BTNZ issues and manages its products, and appoints investment managers and other service providers independently of BT. BTNZ's funds invest in a range of asset classes including equities, fixed interest and listed property, both in New Zealand and globally. WNZL is the primary distributor of BTNZ's funds.

OUR WORKFORCE

Our operations are located across Australia, New Zealand, Papua New Guinea and Fiji. We do not provide broad banking services outside these markets although we have branches in London, New York, Singapore, and Frankfurt that principally support our domestic customers operating internationally, or institutional customers looking for support with Australian and New Zealand products and services.

We directly employ⁹ over 37,000 people across the Group (96% permanent employees; 4% temporary employees).¹⁰ The majority of our direct workforce is based in our core markets of Australia and New Zealand (refer to the map right).

A detailed breakdown of employee headcount and contractors is in the [2024 Sustainability Index and Datasheet](#).

We also use strategic partners, consultants and outsourced providers to support our business. The people involved in these activities (including technology and systems development, accounts payable and certain processing services) are our indirect workforce and are considered part of our total workforce. The majority of our indirect workforce is based across India, Australia, New Zealand, and the Philippines, with a small number of indirect workers located across Fiji, Papua New Guinea, Brazil, Singapore, the United Kingdom, China, the United States and Germany.

⁹ Our direct workforce includes permanent and max term employees, and contractors.

¹⁰ As at 30 September 2024.

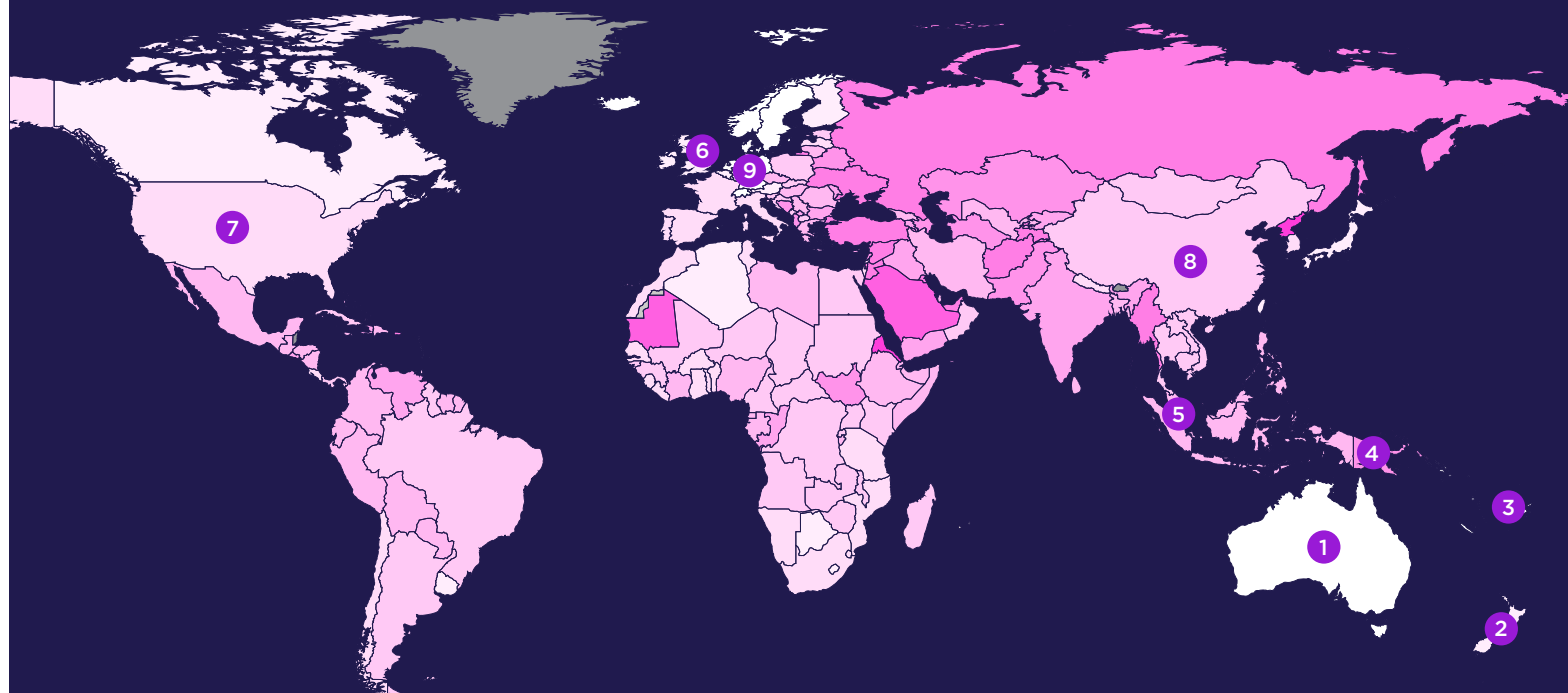
¹¹ Our direct workforce by location is based on headcount in descending order as at 30 September 2024. Our direct employees are all counted as '1' regardless of the hours worked each week.

¹² 'Global Slavery Index 2023: Prevalence of Modern Slavery' – In addressing our risks, we have used a range of data sources. In this map we have used the Global Slavery Index 2023 modern slavery prevalence data, the most up-to-date data source available at the time of risks assessment activities, to provide an indication of each country's modern slavery risk.

OUR DIRECT WORKFORCE BY LOCATION¹¹

1. Australia
2. New Zealand
3. Fiji
4. Papua New Guinea
5. Singapore
6. United Kingdom
7. United States
8. China
9. Germany

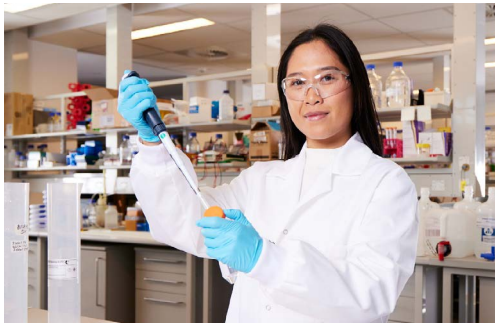
37,000 people across the Group
96% permanent employees



Global Slavery Index 2023¹²

Estimated prevalence of modern slavery by country.





COMMUNITY

We have a proud legacy of supporting local communities by investing in change that matters. Since our first charity was formed in 1879, we have built one of the strongest community offerings in corporate Australia¹³ through our employee workplace giving programs,¹⁴ the Westpac and St.George Foundations and the Westpac Scholars Trust.^{15,16}

In FY24, we invigorated our workplace giving initiative, leading to a 16% increase in employee participation. Our people donated more than \$2.4 million to not-for-profit organisations which Westpac matched. The Westpac Foundation, focused on investing in job creation and social enterprises to help build a stronger and more inclusive Australia, awarded \$2.8 million to 45 social enterprise partners.

The Westpac Scholars Trust also awarded \$4.9 million to 100 scholars who are undertaking varied and meaningful pursuits focused on creating a more sustainable, inclusive and globally connected Australia. During the year, the St.George Foundation¹⁷ focused on investing in small, local charities to provide children and young people with access to education and wellbeing initiatives, awarding more than \$3 million to 51 charities across Australia. Refer to the [2024 Foundations Impact Report](#) for more information.

SUPPLY CHAIN

We source goods and services from a wide range of suppliers. Procurement activity across the Group is primarily managed by two functions:¹⁸

- 1. Group Procurement (Australia) manage procurement activity for:
 - Technology goods and services, professional services and contingent labour; and
 - Other goods and services:
 - which are considered high risk (including due to modern slavery risk factors)¹⁹; or
 - where spend exceeds \$250,000 per annum.
- 2. WNZL Procurement manage procurement activity for our New Zealand business, including technology and non-technology goods and services.

Divisions are permitted to engage suppliers directly for low-risk, low-value and short-term tactical buying needs. Group Procurement has published a ‘self-serve’ step-by-step guide to support the divisions when undertaking their own purchasing activity.

Approximately 99% of Westpac Australia’s spend²⁰ with tier 1 suppliers during the year was with businesses located in Australia, Singapore, the United States, the United Kingdom and Ireland.²¹ Our spend is managed across the following categories:

Category	Description of spend
Technology	Includes professional IT services, business process outsourcing, telecommunications, application services and infrastructure.
Corporate Services	Includes consulting, human resources, legal services, office fit-out, facilities management, cleaning, utilities, rent and outgoings related to our corporate buildings and branches, security services, tools of trade, travel, entertainment, corporate memberships, market data, stationery and records management.
Customer Interactions	Includes commercial print, post, mail-house, marketing, digital and creative services, events, uniforms, promotional merchandise, contact centres, corporate insurance (staff and business) and customer relations.
Customer Solutions	Includes customer loyalty, card manufacturing, card payment processing, general insurance, card insurance, reinsurance, custodial services, shareholder administration, investments and superannuation.
Operations Enablement	Includes freight and couriers, debt collection, settlement agents, valuation services, title searches, cheque and voucher processing, mail room and ATMs.
Other Third Parties ²²	Includes fees for ATMs, point of sale and other payment schemes, bank charges, charitable donations, grants and carbon credits.
Regulatory Fees and Taxation ²³	Includes regulatory fees and taxation.

13. Westpac was named the #1 bank for Corporate Giving by Forbes Australia in 2024.

14. Our charitable donations activities includes our workplace giving programs.

15. Westpac Group provides support to the Westpac Community Trust and the Westpac Buckland Fund (known as the Westpac Foundation), Westpac Scholars Trust and the St.George Foundation (known as St George Foundation, BankSA Foundation and the Bank of Melbourne Foundation). While Westpac was involved in establishing these foundations, they are non-profit organisations that are separate to the Westpac Group. The trustee of St George Foundation Trust (St George Foundation Limited) is a related body corporate of Westpac.

16. In FY25, Phase Two of our HRRA will focus on identifying our salient human rights issues and human rights risks across our community activities and partnerships, including through our charitable donations (including workplace giving) and the Foundations and Trusts we support.

17. Includes BankSA and Bank of Melbourne foundations.

18. Divisions are permitted to engage suppliers directly for low risk, low value and short term tactical buying needs.

19. A supplier could be considered high risk due to several factors, including criticality of services, impacts on customers, exposure to financial crime, ability to meet regulatory or legal requirements and/or operating in or providing goods or services from higher risk countries or from industries considered high risk of modern slavery.

20. Includes Westpac Australia spend only.

21. We track the country of location of tier 1 spend using data from our Accounts Payable system. While the majority of our spend is with businesses located in Australia, in some cases this is because our suppliers have Australian subsidiaries nominated as their address in the Accounts Payable System. In such cases the data may not always accurately reflect where products and/or services are being manufactured or delivered from.

22. Other third parties are not assessed as part of the Responsible Sourcing Program.

23. Regulatory fees and taxation are not assessed as part of the Responsible Sourcing Program.

3. OUR ACTIONS TO IDENTIFY, ASSESS AND ADDRESS MODERN SLAVERY RISKS

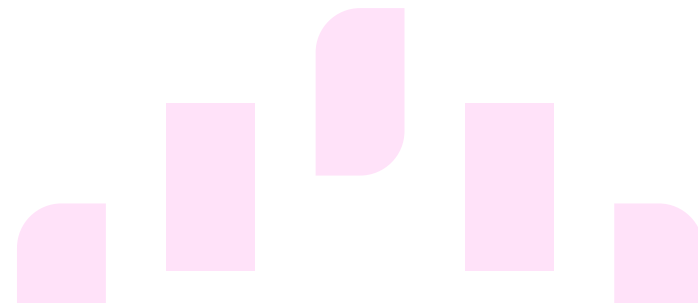


HOW WE IDENTIFY AND ASSESS MODERN SLAVERY RISKS

Modern slavery involves situations of exploitation that people cannot refuse or leave due to threats, violence, coercion, deception, or abuse of power. Modern slavery practices occur at one end of a spectrum ranging from ordinary work to the most serious exploitation of human rights and labour rights. People's experiences may move up or down this spectrum over time and people may be disproportionately impacted where underlying vulnerabilities exist.

Our modern slavery risks can also change over time, as our business changes or as external factors, such as global conflicts, economic challenges and supply chain pressures, influence our risk exposure. We continue to consider how these factors may influence our risk profile.

Given these challenges, it is important that our human rights due diligence and risk management processes seek to target the areas of greatest risk to people.



Deepening our understanding of our salient human rights issues

During the year we completed the first stage of our Human Rights Risk Assessment (HRRRA), which provided insights into our salient²⁴ human rights issues across our lending portfolio²⁵ and supply chain. Future HRRAs will cover our (non-lending) financial products and services, employment practices and community activities and partnerships.

The process involved leveraging insights and validating findings with internal and external stakeholders. We conducted a range of internal interviews and workshops, and engaged with external human rights experts and advocacy groups as well as representatives of affected rights-holders (such as customers and supply chain workers) through civil society organisations and industry groups.

We also reviewed our lending portfolio and our procurement spend categories to identify sectors with a higher inherent level of human rights risk (refer to *Section 3 – Our actions to identify, assess and address modern slavery risks* below).

The process confirmed modern slavery and broader labour exploitation as key areas in which the most severe harm to people could occur in our lending portfolio and supply chain. Recognising the intersectional nature of human rights harm, the HRRRA also identified several pathways where modern slavery may be connected to other issues, for example, where local conflict or climate change may lead to or exacerbate forms of human trafficking or forced labour during times of displacement. Customers may also experience financial hardship or exploitation as a result of forced marriage or child sexual exploitation.

The salient human rights issues identified for our lending portfolio and supply chain are set out to the right. While we can't control or prevent all adverse impacts associated with these issues (particularly where we are directly linked to impacts through our business relationships, where we have limited leverage), we have processes in place that aim to use any leverage we may have to reduce the likelihood and severity of adverse outcomes, and where appropriate, have further identified actions to both strengthen our human rights response and seek improvement opportunities in relation to the human rights risks assessed and identified.

24. According to the UNGPs, 'salient human rights issues' are those areas where the risks of the most severe negative impact to people's human rights are greatest, as a result of our activities or business relationships. These may arise for a range of reasons, both within and outside of the Group's control or influence.

25. While the assessment considered human rights risk across a range of lending scenarios, it did not detail risks specific to each of our consumer brands (i.e. RAMS).

Our role as a bank



As a lender to business, corporates and institutions



A lender to individuals

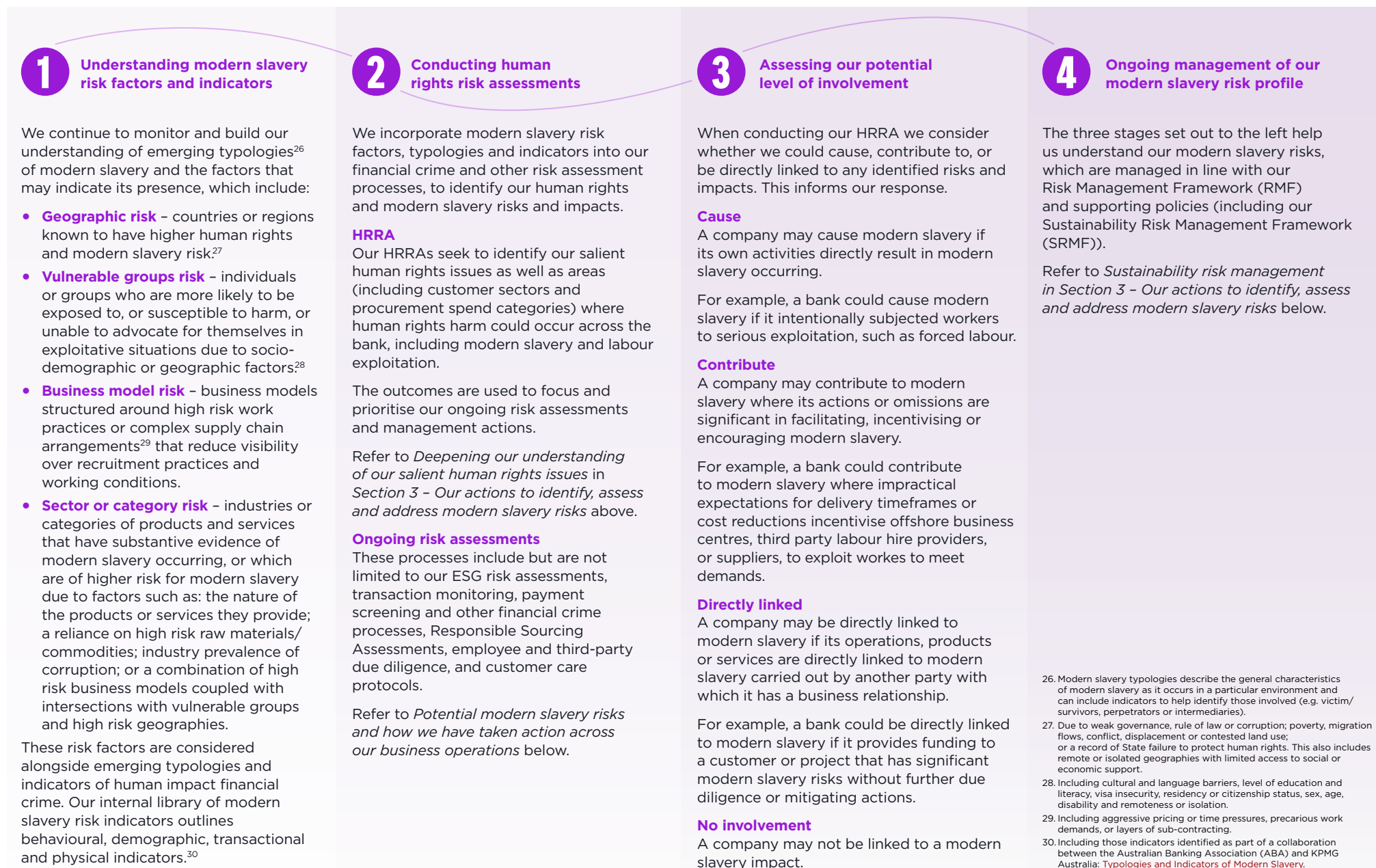


As a purchaser of goods and services

Salient issue	Our role	Description
Health, safety and wellbeing	 	Impacts to the health, safety and wellbeing of workers, consumers and communities in both our own and our customers' operations and supply chains.
Modern slavery and labour exploitation	 	Modern slavery and exploitative labour practices in both our own and our customers' operations or supply chain. Examples include slavery, servitude, human trafficking, forced labour, debt bondage, deceptive recruitment, child labour, and forced marriage.
Conflict and security practices		Customer connections to, or exacerbation of, local conflict and/or the harmful use of security practices against local communities or workers.
Land rights and livelihoods		Customer connections to violations of land rights or Free, Prior and Informed Consent (FPIC) or other adverse impacts to communities and their livelihoods associated with land use and compensation practices.
Climate vulnerability and resilience	 	Our role in supporting customers and communities vulnerable to or affected by climate change, helping to build climate resilience, and financing climate mitigation and adaptation projects.
Customer hardship and exploitation		Our role in supporting and avoiding impacts to customers in times of hardship, vulnerability, exploitation or abuse, including situations of fraud, scams, financial abuse, coercion, or domestic and family violence.
Housing affordability and inclusivity		Our role in supporting customers and communities to access affordable, inclusive and adequate housing.
Financial inclusion and wellbeing		Our role in supporting diverse customers, fostering equitable access to finance, and promoting financial wellbeing so that customers and communities can meet their basic needs.
Privacy and data protection		Protection and respect for the privacy of our customers and their data.

OUR RISK IDENTIFICATION AND ASSESSMENT PROCESSES

The processes we use to identify and assess our human rights and modern slavery risks are specific to the various roles we play as a bank. The diagram below outlines our general approach:



Policy commitments

Our frameworks and policies set the foundation for how we identify and manage risk across our business and supply chain. The table below outlines the key frameworks and policies³¹ that support our human rights commitments and approach to identifying and managing modern slavery risk.

Refer to *Appendix 1* for additional policies and frameworks that support our broader approach to managing ESG and modern slavery.



Human Rights Position Statement and Action Plan and Child Safeguarding Supplement

Purpose and how the policy is implemented:

Our **Human Rights Position Statement and Action Plan** outlines our commitments and approach to human rights (including modern slavery) and integrates our **Child Safeguarding Supplement**.

Our Human Rights Action Plan sets out our strategic areas of focus through to May 2026. Commitments in this position statement are reflected in Group policies, standards, processes and controls, and monitored for compliance through our ESG Obligations Library in our operational risk management and compliance system.



Financial Crime Risk Management Framework and supporting policies and standards

Purpose and how the policy is implemented:

Our FCRMF supports our RMF and outlines our approach to managing financial crime risks and compliance within global and local regulations, including those related to modern slavery and human rights issues. The Framework is supported by a number of Group policies including **Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF)**, **Economic and Trade Sanctions** and **Anti-Bribery and Corruption**, and the Group Financial Crime Risk Standard. Employees are required to complete training on the Framework and supporting policies as part of our mandatory training framework.



ESG Credit Risk Policy

Purpose and how the policy is implemented:

The Group ESG Credit Risk Policy (and WNZL's ESG Credit Risk Policy) sets out our approach for identifying and assessing the impacts of ESG credit risks (including from human rights and modern slavery) on our commercial, corporate and institutional customers. The Policy is supported by divisional standards for institutional and commercial customers. The requirements of the Policy and standards are embedded in our ESG risk assessment tools..



Investment Governance Policies (BT) and Sustainable Investment Policy (BTNZ)

Purpose and how the policy is implemented:

BT's Investment Governance Policies support our superannuation and investment product activities, guided by the principle of choice, to ensure a diverse range of investment options for our investors. The policies outline BT's ESG approach including providing ESG information and tools through partnerships with external companies to help investors make informed decisions.

The Investment Team use the policies to monitor investments and investment managers in accordance with the outlined guidelines, including conducting heightened monitoring when an investment manager engages in poor business practices. The policies are reviewed on an annual basis and approved by the BT Boards with the updates to the policies communicated to relevant business areas through training.

BTNZ's **Sustainable Investment Policy** outlines key ESG factors (including human rights and modern slavery) which BTNZ and its underlying managers are required to incorporate into their investment decisions. To ensure the investment processes of its underlying managers are aligned with its Sustainable Investment Policy, BTNZ also closely monitors its managers' performance and engages a third party to monitor portfolio holdings.



Speaking Up Policy

Purpose and how the policy is implemented:

The **Speaking Up Policy** supports current and former employees, and current and former suppliers and their workers, to raise concerns about suspected or actual unethical or unlawful behaviour (including modern slavery). Relevant employees complete training on the Speaking Up Policy as part of our mandatory training framework.



Code of Conduct

Purpose and how the policy is implemented:

Our **Code of Conduct** sets the standards and expectations of our company and people to do the right thing, including compliance with laws and key policies including our Group Remuneration Policy and Group Recruitment Policy. Employees are required to complete training on our Code of Conduct as part of our mandatory training framework.



Responsible Sourcing Code of Conduct and supporting policies and standards

Purpose and how the policy is implemented:

The **Responsible Sourcing Code of Conduct** outlines how we manage ESG risk across our suppliers (including modern slavery risk) and our expectations of suppliers. These include that suppliers respect human rights, ensure minimum standards for employees, have policies and/or processes in place to identify and address modern slavery risks in their operations and supply chains (or be willing to engage with Westpac to address these risks), and comply with applicable laws, regulations and international standards in relation to the employment of children.

The Procurement Policy (Global) outlines roles and responsibilities for the engagement and management of suppliers across the Group. Our Supplier Risk Management Standard (Australia) outlines how we manage and monitor risk across our suppliers, including conducting Responsible Sourcing Assessments. Relevant employees complete training on responsible sourcing as part of our ongoing mandatory training framework.



Customer Vulnerability Policy and Customer Vulnerability Standard

Purpose and how the policy is implemented:

Our Customer Vulnerability Policy sets out our principles for supporting customers experiencing vulnerability, including modern slavery. The Customer Vulnerability Standard (Australia) outlines how we provide extra care to customers experiencing vulnerability. Requirements of the Policy and Standard are embedded in customer facing and specialist vulnerability teams operational procedures and supported by mandatory training.



Charitable Donations Policy

Purpose and how the policy is implemented:

The Charitable Donations Policy outlines the requirements to manage risk across our charitable donations,³² including modern slavery risk. The policy is supported by our Financial Crime Risk Standard which sets out due diligence requirements for charitable donations. Both documents are available on our intranet and regularly reviewed, with any updates communicated to relevant business areas.

31. These apply across the Group unless otherwise stated.

32. Charitable donations refers to both matched donations as part of our workplace giving program and direct donations using Westpac money.

POTENTIAL MODERN SLAVERY RISKS AND HOW WE HAVE TAKEN ACTION ACROSS OUR BUSINESS OPERATIONS

We assess and manage the risk of modern slavery as it relates to our various roles through our business operations (financial services, lending, investments, employees, and communities) and supply chain:



Customers and operations



Financial services



Risk that customers are experiencing modern slavery through their personal or work circumstances



Risk that customers misuse our products or services to facilitate or benefit from modern slavery, including child sexual exploitation



Lending



Risk that we lend to commercial or institutional customers connected to modern slavery



Investment products



Risk that our wealth management products facilitate investments in companies or assets connected to modern slavery



Employees



Risk that our workers are exploited, prevented from exercising their labour rights, or subjected to unfavourable work conditions



Supporting the community



Risk that our sponsorships, partnerships, grants or charitable donations support organisations connected to modern slavery



Supply chain



Risk that we procure goods with components that are manufactured or sourced using modern slavery



Risk that we procure services from contractors who are connected to modern slavery



FINANCIAL SERVICES

Managing modern slavery risk across our products and services

We expect our customers to respect human rights and where applicable, meet the requirements of our Position Statements (including our [Human Rights Position Statement and Action Plan](#) and [Child Safeguarding Supplement](#)) and the contractual terms of use for our products and services.

Our products or services may be directly linked to modern slavery where they are misused by customers to conduct, facilitate or hide criminal activities including the payment of trafficked labour or child sexual abuse materials, or to launder proceeds of modern slavery. This risk may be higher where customers are involved or transact in activities, industries or geographies that are higher risk for modern slavery. Other types of financial crime may be connected to modern slavery including terrorism financing, bribery and corruption, tax evasion, and economic and trade sanction violations.

We also recognise the connection between modern slavery and scams and fraud, with forced scamming (a type of deceptive recruitment) continuing to be one of the most prevalent and complex types of



modern slavery globally. There is a risk that our products or services may be misused by customers to facilitate scams or fraud, and their victims could include our customers.

We have invested more than \$100 million in scam prevention initiatives over the last two years, contributing to a 29% reduction in reported customer scam losses in FY24. Our fraud detection systems screen approximately 30 million banking interactions daily, using a combination of Artificial Intelligence (AI) and human intelligence to spot unusual activity and issue 24/7 customer alerts.

Our FCRMF (right) outlines our approach to preventing, detecting, managing and reporting financial crime risks, including complying with global and local regulations.

Financial Crime Risk Management Framework (FCRMF)

Principles for combatting modern slavery risks through financial crime risk management

PREVENTION

- **Who** (customers, employees, third parties)
- **How** (channel, products)
- **Where** (jurisdiction)

DETECTION

- **Due diligence** (customers, employees, third parties)
- **Screening** (customers, employees, third parties)
- **Training** (employees)
- **Monitor** (customers, transactions)

MANAGEMENT & REPORTING

- **Manage relationships** (customers, employees, third parties)
- **Regulatory reporting** (customers, transactions)
- **Independent oversight** (independent reviews)
- **Monitor** (customers, transactions)

We seek to assess and identify modern slavery risks through a number of ongoing financial crime processes, including:

- Customer screening and customer risk assessment – enhanced customer due diligence is conducted on customers who may pose a higher financial crime risk, including modern slavery and child sexual exploitation risk. This includes obtaining further information and conducting detailed analysis of customers and their activities.
- Jurisdictional risk assessments.
- Payment screening and transaction monitoring.
- Enforcement of the Group Sanctions Policy and sanctions compliance program – including sanctions designations related to modern slavery or human rights abuses.
- Adverse media monitoring.

Where suspicions of modern slavery or other human impact financial crime are identified, Unusual Matter Reports (UMRs) are used to escalate matters to our financial crime teams for further investigation and referral to Australian Transaction Reports and Analysis Centre (AUSTRAC) as required.

PROGRESS IN FY24

- Updated our Financial Crime Risk Standard to strengthen how we identify, take action and respond to suspected modern slavery offences (including child sexual exploitation and human trafficking) through enhanced customer due diligence requirements, transaction monitoring detection scenarios and controls uplift.
- Uplifted charitable donations due diligence in line with strengthened requirements set out in our Financial Crime Risk Standard.
- Reviewed our Product and Channel Risk Assessment (PCRA) to include modern slavery considerations. The PCRA assesses potential financial crime risks associated with our products and product channels.
- Regularly reviewed and updated our media and transaction monitoring procedures and relevant detection scenarios to include new modern slavery or child sexual exploitation typologies or indicators. This included enhancing detection scenarios and testing for sextortion in response to an increase in reported matters.

Supporting customers vulnerable to modern slavery

We may identify customers vulnerable to or experiencing modern slavery through interactions in branches, over the phone or online. The vulnerability of our customers to modern slavery may be increased due to their banking decisions, financial security or hardship, or fraud and scams.

Although instances or allegations of modern slavery may not be directly related to our relationship with customers, we aim to support vulnerable customers in line with our Vulnerable Customer Policy and Vulnerable Customer Standard (Australia).³³ Suspicions or disclosures of modern slavery are required to be escalated to our specialist vulnerability teams who provide vulnerable customers with extra care. Our Vulnerable Customer Toolkit (Australia) includes referral partners who can be accessed for additional support (Freedom Hub and Salvation Army Trafficking and Slavery Safe House).

Suspicions or disclosures of modern slavery are also escalated through UMRs, including concerns raised by customers or unusual banking activity (i.e. unusual transactions). UMRs are investigated by our financial crime team and as required, referred via Suspicious Matter Reports (SMRs) to AUSTRAC who provide information to the police and law enforcement agencies. Refer to *Section 5 – Assessing the effectiveness of our actions and future focus* below, for matters raised during FY24.

WNZL

WNZL's Extra Care team provides support to customers facing vulnerability, including those who may be impacted by modern slavery in line with the WNZL Customer Vulnerability Policy. In FY24, WNZL's Extra Care team delivered refreshed extra care training (refer to *Training and capability building* in *Section 3 – Our actions to identify, assess and address modern slavery risks* below) and launched their Customer Vulnerability Toolkit, which includes modern slavery. World Vision New Zealand also shared insights on modern slavery risk in supply and value chains for the finance sector to WNZL employees, including customer facing and specialist vulnerability teams.

Using data and online footprints to detect and protect children

Throughout our four-year partnership, the International Centre for Missing and Exploited Children (ICMEC) Australia has sought to bring industry together to share information and data that will help to better detect and report suspicious transactions relating to child sexual exploitation (CSE) and provide crucial evidence for investigators. Their Australian Collaboration Working Group, of which Westpac is a member, meets approximately 18 times a year to connect individuals and teams working across financial services organisations, law enforcement and government to discuss emerging trends, issues and opportunities to fight this crime. They also facilitate projects that help improve how CSE is detected in financial transactions.

In FY24, ICMEC Australia held eight capability building sessions, collectively attended by over 900 attendees. In addition, our funding has supported ICMEC Australia to partner with universities to advance the knowledge base of CSE, including research with the University of Queensland to examine the cost of child sexual exploitation and abuse in Australia.

We remain committed to using insights gained through our external partnerships to continually improve our financial crime detection and reporting processes. In September 2024, ICMEC Australia presented to over 300 members of Westpac's Financial Crime Surveillance team. The presentation provided an update on the topic of online-facilitated CSE and emphasised how financial institutions can continue to help fight CSE by utilising data and online footprints left behind by perpetrators using financial platforms.

33. Sets the minimum requirements to be applied by Westpac Group divisions based in Australia to provide extra care for customers experiencing vulnerability.

LENDING

Modern slavery risks related to our lending

There is potential for us to be directly linked or contribute to modern slavery where we provide lending, project finance or other financial products or services to customers that are involved in modern slavery in their own operations, supply chains or business relationships. This risk is heightened where customers are connected to higher-risk sectors, geographies or complex business models and supply chains.

Human rights risk assessment

Through the HRRRA we identified customer sectors with a higher inherent level of human rights risks including modern slavery risk (refer right). In FY25, we aim to incorporate these findings into divisional ESG risk assessment tools, where applicable, to inform our customer due diligence approach.

34. Accommodation and hospitality includes catering and food service activities (including restaurants and cafes), tourism, entertainment and leisure, and sex work.

35. Government and administration includes defence, social protection and emergency services.

36. Services includes information and technology services, and community, recreational and personal services.

37. Trade includes retail and manufacturing of high risk products such as electronics, food and beverage, industrial equipment and heavy machinery, personal and household goods.

38. Utilities and power includes renewable energy and waste disposal.

 Sector	 Geography	 Vulnerable groups	 Business models
Lending category	Key risk factors		Examples of potential modern slavery or other exploitation
Accommodation and hospitality ³⁴	 		- Underpayment of wages or excessive work hours across young workers (including children), migrant workers and contingent workforces. - Facilitation of human trafficking or child sexual exploitation through accommodation, hospitality, entertainment and leisure, and sex work providers.
Agriculture, forestry and fishing	   		Forced labour (including State-sponsored forced labour), child labour, deceptive recruitment, debt bondage, underpayment of wages or excessive work hours across plantation, growing/fishing, harvesting, and food processing workforces (including seasonal and contingent workforces) and supply chains.
Construction	  		- Unsafe exposures to hazardous work conditions, deceptive recruitment, debt bondage, underpayment of wages or excessive work hours across permanent and contingent workforces and supply chains (including sub-contractors). - Forced labour, child labour, debt bondage, underpayment of wages or excessive working hours across supply chains for construction and fit-out materials.
Finance and insurance			- Debt bondage, underpayment of wages or excessive work hours across outsourced/third party or offshored workforces. - Facilitation of human trafficking or child sexual exploitation through the misuse of financial products and services.
Government and administration ³⁵	 		Underpayment of wages or excessive work hours across social protection and emergency service providers or low or base skilled workforces.
Mining and extractives	   		Forced labour, child labour, exposure to hazardous work conditions, deceptive recruitment, debt bondage, underpayment of wages or excessive work hours across workforces and supply chains (including artisanal mining).
Commercial property	 		Deceptive recruitment, debt bondage or underpayment of wages across construction, fit-out and facilities maintenance workforces and supply chains (including sub-contractors).
Property and business services	  		Deceptive recruitment, debt bondage or underpayment of wages across cleaning, security, waste management, repairs and maintenance workforces and sub-contractors.
Services ³⁶	   		Underpayment of wages or excessive work hours across frontline (e.g. healthcare, aged care) workforces and young workers (including children). Forced labour, deceptive recruitment, debt bondage, underpayment of wages or excessive work hours across information and communications technology workforces.
Trade ³⁷	   		Forced labour (including State-sponsored forced labour), child labour, deceptive recruitment, debt bondage, underpayment of wages or excessive working hours across retail and manufacturing workforces and supply chains.
Transport and storage	  		Human trafficking, forced labour, deceptive recruitment, debt bondage, underpayment of wages or excessive working hours across transportation, construction, seafaring and stevedoring/port workforces and supply chains. Human trafficking facilitated through air and sea transport providers.
Utilities and power ³⁸	   		Forced labour (including State-sponsored forced labour), child labour, deceptive recruitment, debt bondage, underpayment of wages or excessive work hours across supply chains (including those associated with the sourcing of critical transition minerals, production of solar panels or wind turbines, and disposal of waste and electronic waste).

Business and institutional due diligence

Through our credit and lending processes, we identify high risk customers and transactions for additional due diligence, ongoing monitoring and direct engagement (as required). In line with the Group ESG Credit Risk Policy, ESG risk assessments are conducted across institutional and commercial customers and transactions to understand sustainability risks (including human rights and modern slavery) and screen for alignment with our policies and position statements, including our **Human Rights Position Statement and Action Plan** and **sector position statements** (e.g. agriculture and defence) and SRMF.

Institutional lending

Where ESG risk assessments identify institutional customers or transactions as high risk for modern slavery (including where customers are operating in high-risk geographies or sectors), they are referred to the Institutional ESG specialist team for review. In FY24, 59 customers were escalated to the Institutional ESG specialist team for further due diligence or customer engagement (as required) due to modern slavery risk.

As required, transactions may also be escalated to the Institutional Customer and Transaction Risk Escalation Committee (CTREC) comprising experienced executives including from sustainability

and risk management. The Institutional CTREC considers transactions for ESG, reputational risk, conflicts and financial crime risk and alignment to our **sector position statements**. The Chief Executive of the respective division (or the delegated General Manager in WNZL) has authority to approve a transaction to proceed within delegation or escalate to the ESG and Reputation Committee (ESGR Committee) and/or the CEO. This process is set out in our Institutional ESG Risk Management Standard.

Business lending

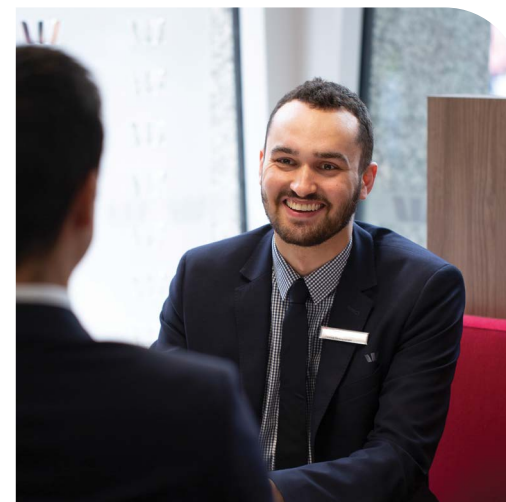
ESG risk assessments of business³⁹ customers or transactions are escalated to the Business and Wealth ESG specialist team where the outcome is considered high risk, or where further review is required in line with the Business Bank ESG Risk Management Standard. In FY24, one customer connection with modern slavery risk was identified and referred to the Business and Wealth ESG specialist team for further due diligence or customer engagement (as required).

The Business and Wealth ESG specialist team may support (including with conditions) or decline the risk assessments or escalate them as required to the Business and Wealth CTREC. The Business and Wealth CTREC may also further escalate transactions to the ESGR Committee and/or CEO.

WNZL

WNZL's ESG Credit Policy guides its approach to identifying and assessing ESG risks (including human rights and modern slavery) at a customer, transaction and sector level. It also supports WNZL's SRMF and the Group ESG Credit Risk Policy.

Where ESG risks are identified through the credit process, an ESG materiality assessment is required to determine the escalation pathway, which may include escalation to WNZL's ESG specialist team for further review, due diligence or customer engagement (as required). In FY24, four customers were escalated to WNZL's ESG specialist team due to modern slavery risks (including concerns related to the sector which the customer was operating in or their sourcing activities).



PROGRESS IN FY24

- Continued to enhance our monitoring process for ESG risks related to our institutional customer portfolio by further integrating data into systems and visualisation tools.
- Digitised business ESG risk assessments. Dashboard reporting to support monitoring of ESG risks related to our business customer portfolio (within our Business and Wealth division) is expected to be implemented during FY25.
- Strengthened onboarding processes across WNZL for customers identified as 'seasonal workers', to support their ability to access bank accounts and help manage the potential risk of modern slavery.
- Continued to support capability uplift of employees to identify and manage human rights and modern slavery risk through online ESG fundamentals and modern slavery learning modules.
- Reviewed and uplifted the WNZL ESG Credit Policy to more closely align with the Group ESG Credit Risk Policy to help promote consistency in assessing ESG risks (including human rights and modern slavery).

39. Within the Australian Business Division.



INVESTMENT PRODUCTS

Modern slavery risks relevant to our investment products

As products issued by BT or BTNZ invest in other securities and financial products,⁴⁰ there is a risk that we may be directly linked to modern slavery where those investments are in companies or assets connected to modern slavery. The risk is higher for investments associated with, or which have supply chains in, industries and geographies with higher modern slavery risk. The underlying investments span multiple asset classes, industries and countries which make assessing the risk of modern slavery challenging.

BT Financial Group

As a platform provider and product issuer, BTFM and BTPS enable investment in financial products at the direction of BT investors. Due to the nature of these investments, BTFM and BTPS may have limited ability to influence the management of modern slavery risks associated with the underlying companies or assets.

BT's Investment Governance Policies support superannuation and investment product business activities, guided by the principle of choice, ensuring a broad range of investment options for our investors. Further, investment due diligence for our superannuation products must promote the best financial interests of members.

The policies outline BT's approach, including providing ESG-related information and tools through partnerships with external companies, helping investors consider ESG factors in their decisions.

40. Either at the direction of the investor (in the case of platforms) or by the responsible entity or an appointed investment manager (in the case of managed funds or managed portfolios).

BT offers a sustainable investment list to advisors and investors, detailing the investment options available within BT products that have been certified by RIAA. Advisers and investors are also provided with select ESG information on Australian listed companies through Sustainalytics which may assist in making decisions around equity investments.

Managed portfolios and managed funds issued by WFSL invest in other financial products at the discretion of the responsible entity or an appointed investment manager.

BTNZ

BTNZ's **Sustainable Investment Policy** excludes investment in companies and other issuers who are identified to be in breach of international human rights or labour standards, as assessed by BTNZ's research providers. BTNZ also requires its underlying investment managers to comply with modern slavery legislation applicable in their jurisdictions.

PROGRESS IN FY24

- BT reviewed its Investment Governance Policy and established two separate policies to support both superannuation and investment product business activities, addressing their differing roles. BTFM approved the Superannuation Investment Governance Policy.
- Adoption of the Group Sustainability Risk Management Framework was approved by the BTFM Board and incorporated into the Superannuation Investment Governance Policy.

EMPLOYEES

We are committed to respecting the human rights and labour rights of our employees, including by implementing policies and programs which aim to provide a safe and secure workplace, that supports the wellbeing of our people and reduces the potential for harm.

Modern slavery risks relevant to our employees

We recognise there may be a risk that our employees are exploited, prevented from exercising their labour rights, or subjected to unfavourable working conditions. This risk tends to be higher across our temporary or contingent labour, where we may have limited visibility over the pay and recruitment practices of third party agents. The risk may also be higher if we employ low skilled workers or workers with existing vulnerabilities, or where we operate or have contingent labour in geographies that are high risk for modern slavery.

We consider the risk of modern slavery in our direct operations to be low. The majority of our workforce is located across Australia and New Zealand which are relatively low risk jurisdictions for modern slavery. For our directly employed workforce, we have visibility over employment terms and conditions, and ensure they are in line with applicable employment laws. We also maintain a library of employment obligations within our operational risk management and compliance system (designed to help us

meet regulatory requirements in relation to child labour, migrants and paying our people correctly) and grievance mechanisms are available to our workforce.

Managing modern slavery risks across our workforce

Our commitment to provide a safe and secure workplace for our people and maintain compliance with our employment obligations is supported through:

- Our people policies and practices (including our Code of Conduct, Group Remuneration Policy, and Group Recruitment Policy), which seek to ensure that Westpac employees are able to join unions, enter into collective agreements and receive equal pay for equal work.
- The nature of our workforce arrangements – we do not employ casual employees, or irregular and transitory workers in Australia.
- Our employment arrangements and terms, which are set out in written employment contracts and other industrial instruments (including Enterprise Agreements for Australia, and Collective Agreements in New Zealand, Fiji and PNG).
- Our due diligence and verification processes – we conduct initial and ongoing due diligence of employees, in line with our Financial Crime Risk Management Standard, commensurate



to the level of financial crime risk associated with their role. We also seek to verify the age of our candidates prior to them commencing employment, to reduce the risk that we employ children under minimum employment age in line with relevant laws.

- Mandatory training for employees⁴¹ on our Code of Conduct including speaking up, inclusion and diversity, respectful conduct, and our approach to discrimination, harassment, bullying and sexual harassment.
- Communication of our grievance mechanisms (including our Speaking Up Policy), which are available to current and former employees (including contractors, temporary employees and secondees) and suppliers.
- Our Responsible Sourcing Questionnaire, which assesses modern slavery risk in our supply chain (including for labour hire and outsourcing arrangements) and how suppliers manage outsourcing, employment of temporary visa holders,

workers under the age of 18, and use of recruitment agencies and subcontractors. Refer to *Potential modern slavery risks across our supply chain* below.

- Where suppliers are providing labour hire under our Talent Acquisition Managed Service Provider (MSP) agreement, workers are paid in accordance with the Banking and Finance award which is aligned with award uplifts made by Fair Work.

PROGRESS IN FY24

- Reviewed our existing Australian Enterprise Agreement with a focus on employee feedback and strengthening existing employment benefits and arrangements which are in line with, or better off overall than, the Banking, Finance and Insurance (BFI) award and comply with the National Employment Standards. The new Agreement was supported by 87% of employees who voted and was approved by the Fair Work Commission. The new Agreement will operate from 1 January 2025.

41. Includes all active Group-wide employees, excluding Pacific.

SUPPORTING THE COMMUNITY

Managing modern slavery risks across our charitable activities

Through our community programs we aim to help make a difference to people and organisations. This includes through our charitable donations and matched giving programs, and our work on safeguarding children through our SCSC program.

In FY24, we contributed \$6.3m in charitable donations⁴² and \$2.4m in matching gifts⁴³ to organisations and communities to fund charitable activities. We acknowledge there is a risk that these contributions may be directly linked to modern slavery where they support people or organisations that are connected to modern slavery, particularly where they operate in or source from industries or countries that are higher risk for modern slavery.

PROGRESS IN FY24

Continued to strengthen due diligence requirements for charitable donations, including refreshing our Charitable Donations Policy which outlines the requirements to manage risks across our charitable donations,⁴⁴ including modern slavery risk. We also updated our Financial Crime Risk Standard to support the Policy. We will continue to implement strengthened due diligence requirements during FY25.

Safer Children, Safer Communities program

Our SCSC work program included a series of actions and investments delivered across Australia and Asia-Pacific aimed at making a meaningful impact on child safety and protection. As we marked the fourth year of the program, a majority of the funding has been committed to multi-year grant programs, including combatting and preventing harm to children associated with financial crime, protecting children and young people from exploitation in the Philippines, Thailand and Cambodia, research grants looking at innovative solutions for addressing child sexual exploitation, and programs addressing child protection and wellbeing in Australia. We know more needs to be done and we will continue to collaborate with our partners, share insights and engage in initiatives to help protect children and young people from harm.

42. Cash donations, made with no commercial intent, to organisations or communities to fund charitable activities. They are typically in response to an appeal or initiated by management or an employee, and tend to be one-off.

43. When the company provides a monetary contribution to match employee money raised or donated to a charity. Only the money that the company itself donates is counted.

44. For entities receiving charitable donations from our Australian business.

45. Data is from 1 October 2023 to 31 March 2024 and includes children, young people and adults directly reached through funded programs in the Philippines.

The On Us Business Coalition: Safeguarding children and young people through collective action

Businesses play a crucial role in safeguarding children and young people, yet business awareness of the potential impacts of their activities on this cohort remains low. To help address this, Westpac provided funding to the Australian Childhood Foundation to create a cross-sector initiative to strengthen the capability and commitment of Australian businesses to safeguard children and young people.

The On Us Business Coalition has a clear vision, that children and young people are safe wherever they are, and seeks to enact four key priorities to educate, share, act and advocate for children and young people. Founding members of the Coalition include Westpac, IHG Hotels and Resorts, GPT Group, TikTok and TBWA. Since its official launch in November 2023, the Coalition has welcomed two new members, Rugby League Players Association and OBE organic. In FY24, the Australian Childhood Foundation directly engaged with 21 businesses to increase their awareness of the Coalition and its work.

To strengthen business commitment to child safeguarding and drive concrete action, the Coalition is developing Child Business Principles to be launched in November 2024. This will be accompanied by practical tools for business to support the implementation of the Principles.



CASE STUDY

Four years of funding 'on-the-ground' efforts to help protect children in Australia and Asia

Our SCSC program has made strong progress since its inception. Since 2020, we have granted over \$77 million to over 50 child safeguarding organisations to help children and young people in Australia and Asia. During FY24:

- Our funding⁴⁵ helped the International Justice Mission (IJM) support 126 victim rescues and trained 400 adults including law enforcement officials, prosecutors, and aftercare service providers on trauma informed and victim centred ways of working. It also supported Save the Children to provide child protection training to 6,413 children and 2,490 adults across 392 community training workshops to raise awareness of online child sexual exploitation as part of the delivery of the 'Protect Children - Philippines' project.
- We provided funding to The Benevolent Society to seven local organisations across Condobolin (NSW), Caboolture (QLD) and Port Augusta (SA) to co-design innovative solutions that address local child protection and wellbeing needs. These place-based initiatives seek to build the capability of local communities to support the safety and wellbeing of children and young people.
- We funded research partner activities focused on child abuse and exploitation. Academics from the University of New South Wales (UNSW) and the Australian Human Rights Institute conducted a study aimed at measuring attitudes and behaviours of Australian men towards child sexual offending.

POTENTIAL MODERN SLAVERY RISKS AND HOW WE HAVE TAKEN ACTION ACROSS OUR SUPPLY CHAIN

SUPPLY CHAIN

Modern slavery risks related to our supply chain

There is a risk that we could be directly linked to modern slavery if we procure goods from suppliers that use modern slavery, or have modern slavery in their supply chains. Through our Responsible Sourcing Program we have identified 10 categories in our supply chain which are higher risk for modern slavery (including due to the employment of temporary visa holders, use of low skilled labour, child labour or potential forced labour, or the offshore manufacturing of goods in high-risk countries).

During FY24, we used the HRRRA to identify a list of broader industries with higher inherent human rights (including modern slavery) risks. This list was used to validate our existing mapping of 10 high risk spend categories and deepen our understanding of the potential forms of exploitation and modern slavery associated with each category (as outlined in the table right). In FY25 we will continue to review and, where necessary, uplift our supplier risk assessment tools to reflect learnings from the HRRRA.

Geography	Vulnerable groups	Business models	
High risk spend category	Key risk factors	Examples of potential forms of exploitation and modern slavery	
Apparel ⁴⁶	  	Forced labour (including State-sponsored forced labour), child labour, deceptive recruitment, debt bondage, underpayment of wages or excessive working hours across textile and garments manufacturing workforces and supply chains for raw materials (e.g. cotton).	
Business Process Outsourcing (Onshore) ⁴⁷	 	Deceptive recruitment, debt bondage, underpayment of wages or excessive work hours across outsourced/third party workforces.	
Business Process Outsourcing (Offshore) ⁴⁸	  	Deceptive recruitment, debt bondage, underpayment of wages or excessive work hours across outsourced/third party workforces.	
Cleaning and facilities maintenance ⁴⁹	 	Deceptive recruitment, debt bondage or underpayment of wages across cleaning, waste management, repairs and maintenance workforces and sub-contractors.	
Construction ⁵⁰	  	- Unsafe exposures to hazardous work conditions, deceptive recruitment, debt bondage, underpayment of wages or excessive work hours across permanent and contingent workforces and supply chains (including sub-contractors). - Forced labour, child labour, debt bondage, underpayment of wages or excessive working hours across supply chains for construction and fit-out materials.	
Hospitality and accommodation ⁵¹	 	- Underpayment of wages or excessive work hours across young workers (including children), migrant workers and contingent workforces. - Facilitation of human trafficking or child sexual exploitation through hospitality and accommodation providers. - Forced labour (including State-sponsored forced labour), child labour, deceptive recruitment, debt bondage, underpayment of wages or excessive work hours across food and beverage supply chains.	
IT hardware ⁵²	  	Forced labour (including State-sponsored forced labour), child labour, deceptive recruitment, debt bondage, underpayment of wages or excessive working hours across electronics manufacturing workforces and supply chains for raw materials (e.g. cobalt, nickel).	
Manufactured products ⁵³	  	Forced labour, child labour, deceptive recruitment, debt bondage, underpayment of wages or excessive working hours across manufacturing workforces and supply chains.	
Labour hire ⁵⁴	 	Deceptive recruitment, debt bondage or underpayment of wages across third-party labour hire agencies.	
Security services ⁵⁵	 	Deceptive recruitment, debt bondage or underpayment of wages across security workforces and sub-contractors.	

46. Includes uniforms for our branch staff and textile-based goods.

47. Includes mail sorting, document scanning, and call centres.

48. Includes mortgages and data processing, call centres and IT systems support.

49. Includes cleaning and maintenance services in our corporate buildings and branches, including outgoings paid to landlords for activities on our behalf.

50. Includes construction and fit-out projects, services, raw materials and furnishings used in our corporate buildings and branches, including construction and contracted labour.

51. Includes catering and hospitality services in our corporate buildings and spend on corporate travel and hotels.

52. Includes IT and telco hardware and consumables (e.g. computers, modems and other electronic equipment).

53. Includes merchandise, office supplies and stationery, PPE, security equipment, ATMs and commercial print.

54. Includes general contingent and contractors.

55. Includes security, guarding services and mobile patrols for our corporate buildings and branches.

Responsible sourcing

Our Responsible Sourcing Program has been designed to support the identification, management and monitoring of ESG risks (including modern slavery) across our supply chain. It is embedded into supplier risk assessments for our Australian based divisions. Through the program, suppliers identified as high-risk are required to complete a digital Responsible Sourcing Questionnaire and demonstrate how they are working to reduce and prevent modern slavery risk in their supply chain.

The questionnaire is aligned to our Responsible Sourcing Code of Conduct and supported by a Responsible Sourcing clause in our standard Master Supply Agreements which requires suppliers to participate in our Responsible Sourcing Program and notify us if they identify any instances or allegations of modern slavery in their operations or supply chain.

1 Step 1: Initial risk assessment

We conduct an initial risk assessment of suppliers at the onboarding stage, taking into account category risk, country risk, vulnerable groups and higher risk business practices. The output of the initial risk assessment is an inherent risk rating.

Category risk

Refer to *Modern slavery risks related to our supply chain* above for an overview of our prioritised high-risk supplier categories. As at the end of FY24, we had screened suppliers representing 95% of spend across high-risk supplier categories through our Responsible Sourcing Program.

Country risk

As part of our Responsible Sourcing Assessment, we collect information about the countries that goods or services will be manufactured in or delivered from. Country information is mapped against our country risk profiles, which have been compiled based on inputs from sources such as the Global Slavery Index,⁵⁶ Worldwide Governance Indicators⁵⁷ and Trafficking in Persons Report.⁵⁸

Vulnerable groups and higher risk business practices

As well as factoring category and country risk into our initial risk assessment, we assess whether suppliers employ people from vulnerable groups or undertake higher risk business practices, including:

- Employment of children under 18.
- Employment of temporary visa holders.
- Outsourcing of business processes.

Suppliers that are higher risk based on category or country risk, or that engage in one of the activities listed above, must complete our Responsible Sourcing Questionnaire.

2 Step 2: Responsible Sourcing Questionnaire

The Responsible Sourcing Questionnaire includes questions relating to:

- **Business practices:** where a supplier responds that they employ workers under the age of 18, temporary visa holders or outsource certain aspects of their business practices, we ask for further information about the controls they have in place to manage modern slavery risk.
- **Modern slavery management:** identification and management of modern slavery risk in supply chain and operations, employment practices and subcontracting.
- **Workplace practices and governance:** withholding of employee identification documentation, workplace health and safety, grievance management, corporate governance and risk management.

If the Responsible Sourcing Questionnaire identifies a gap in a supplier's policies or processes relating to modern slavery, in most cases we create a supplier action plan (refer to *Supplier action plans* below).

3 Step 3: Reassessment

The Responsible Sourcing Assessment process is repeated every three years or when there is a substantial change in the product or service being delivered (whichever is sooner).

Adverse media screening

We use our adverse media screening program to help monitor modern slavery risks for a selection of suppliers with an increased inherent risk of modern slavery. In FY24, this involved the weekly monitoring of 50 suppliers.

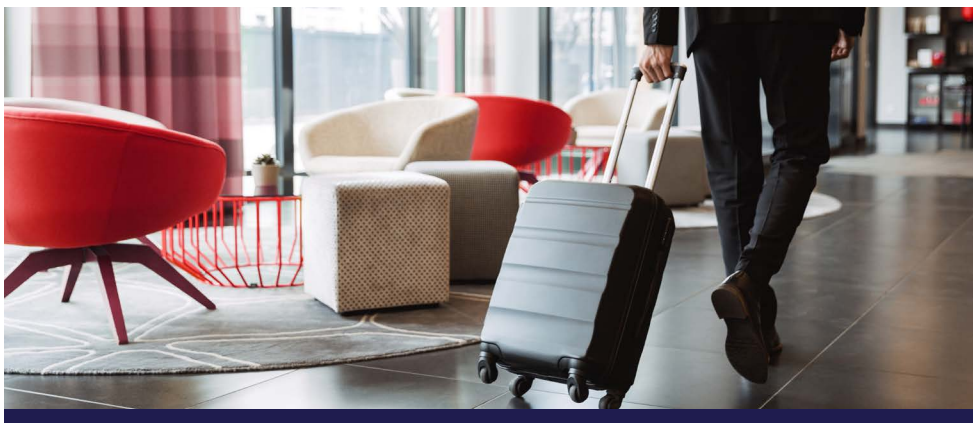
Responsible Sourcing Assessments in FY24



56. Walk Free [Global Slavery Index](#).

57. The World Bank [Worldwide Governance Indicators](#).

58. U.S. Department of State [Trafficking in Persons Report](#).



CASE STUDY

Ongoing due diligence of indirect suppliers

We recognise the importance of seeking to understand modern slavery risks in our supply chain beyond our direct suppliers. In FY24, we continued to prioritise high-risk sectors of our supply chain through the following reviews.

Facilities management

We conducted further due diligence of a selected facilities management supplier operating in a high-risk sector to evaluate their response to the modern slavery risks in their supply chain and linked to subcontractors. We assessed their policies and processes through a desktop review and interviews of key personnel. We identified opportunities for improvement in the transparency and governance of their subcontracting arrangements, accessibility of their grievance mechanisms and capability of employees to identify modern slavery. The supplier took immediate action to improve their existing processes, key subcontractor touchpoints (including onboarding, during service delivery and availability of grievance mechanisms) and improve training for employees. We will continue to monitor the progress of these actions as part of our ongoing engagement with the supplier.

Employee business travel

We engaged with our direct travel management supplier to conduct further due diligence of indirect accommodation suppliers (preferred hotels) available for employee travel. We reviewed 24 preferred hotels available for employee business travel through our travel management supplier. The hotels were selected based on historical frequency of use, and high-risk jurisdictions. The review focused on policies and processes in place for managing modern slavery risk, employment of children, and the safety of children on hotel premises, including the risk of child sexual exploitation. While most hotels had policies and processes in place to address modern slavery in their operations, only a few hotels had measures in place to adequately safeguard against the exploitation of children on their premises.⁵⁹

In collaboration with our travel management supplier and preferred hotels, we developed recommendations to strengthen our travel management supplier's process for due diligence over hotels, and opportunities to strengthen preferred hotels' policies and processes, training and incident response plans related to modern slavery and child safeguarding. We continue to monitor the progress of the recommendations, which will form part of future reviews of preferred hotel arrangements.

Supplier action plans

During FY24:

- 53 new priority action plans were created
- 38 of those were resolved
- 15 remain in progress and will be actively managed into FY25

Supplier action plans are created where the Responsible Sourcing Questionnaire identifies gaps in a supplier's policies or processes for managing sustainability related risks (including modern slavery). If identified gaps relate to a supplier's management of modern slavery risks, a priority supplier action plan will be created.⁶⁰

Timeframes are set for completing their actions, which are centrally monitored and any overdue priority action plans are escalated and followed up.

WNZL

WNZL undertakes screening, due diligence, and assessments of suppliers to determine sustainability risks, such as modern slavery, through their Responsible Sourcing Assessment which is aligned to our Global Procurement Policy and Australia Responsible Sourcing Program. WNZL's approach to modern slavery risk management is also supported by the WNZL Responsible Sourcing Principles, which

outline WNZL's commitment to respecting human rights and addressing modern slavery. In FY24, 82% of WNZL's spend⁶¹ with tier 1 suppliers was with businesses located in New Zealand.

During the year, 92 suppliers were screened for responsible sourcing risk and 63 completed the Responsible Sourcing Assessment. WNZL continues to focus on improving its approach to monitoring suppliers and building sustainable supplier opportunities.

PROGRESS IN FY24

- Continued to assess location specific modern slavery risks across our supply chain through data from suppliers (via our Responsible Sourcing Questionnaire) at the location that their products and/or services are manufactured or delivered from.
- Implemented a digital supply chain ESG transparency tool to enhance supply chain visibility beyond tier 1 suppliers in high-risk sectors. Since implementation, we have been monitoring third party site audits in collaboration with a number of suppliers (including tier 2 suppliers) to ensure they take action to maintain safe and fair working conditions for workers.
- Completed further due diligence of selected facilities management and accommodation suppliers to verify and validate policies and processes in place to identify, mitigate and manage modern slavery risks.
- Updated our Responsible Sourcing e-learning module to include updated screening processes, modern slavery statistics and revised case studies.

59. We were not made aware of any incidents related to modern slavery or the safeguarding of children against exploitation by the hotels in-scope for the review.

60. This specifically applies where the Responsible Sourcing Questionnaire identifies a gap in a supplier's controls relating to management of employees under 18 or temporary visa holders, or where a supplier discloses that they withhold employees' original identification documents.

61. WNZL tracks the country of location of tier 1 spend using data from their Accounts Payable system. The majority of WNZL's spend is with businesses located in New Zealand, however in some cases this is because our suppliers have New Zealand subsidiaries nominated as their address in the Accounts Payable System. In such cases the data may not always accurately reflect where products and/or services are being manufactured or delivered from.

SUSTAINABILITY GOVERNANCE AND RISK MANAGEMENT

BOARD AND EXECUTIVE OVERSIGHT

The Board has oversight of our approach to human rights including modern slavery. They approve key sustainability policies, including our [Human Rights Position Statement and Action Plan](#), as part of their oversight of our sustainability strategy. Our Board-approved Risk Appetite Statement also includes statements and measures relating to sustainability risk.

The Board Risk Committee (BRiskC) reviews and approves the SRMF every two years and reviews the monitoring of reputational and sustainability risk performance. The Board and its Committees also receive regular reports from the Group Executives which include sustainability-related matters.

The day-to-day management of our sustainability approach, including modern slavery, is the responsibility of the CEO and is delegated to Group Executives and senior management where appropriate. A range of committees help assess sustainability related matters including the ESGR Committee.

The ESGR Committee is chaired by the CEO and oversees decisions on significant ESG-related matters, including the implementation of our sustainability strategy. Group Sustainability is responsible for the development of our sustainability positions (including our [Human Rights Position Statement and Action Plan](#)) and sets the Group sustainability strategy

Overview of board and management level oversight and management of sustainability and human rights related issues

Board level

Board

Approves material sustainability positions (including Human Rights Position Statement and 2026 Action Plan). Approves Board Risk Appetite Statement and Risk Management Framework.

Board Risk Committee

Approves Sustainability Risk Management Framework (SRMF). Reviews Board Risk Appetite Statement.

Management level

Executive Team

Oversees Sustainability Strategy implementation.

Group Executive Risk Committee

Divisional Risk Committee
Considers material sustainability risks by division, including risk profile assessments, and risk appetite.

Customer & Transaction Risk Escalation Committee (CTREC)

Meets weekly (Institutional) or as required (Business) to escalate key transactions to relevant executives for ESG review and decision.

ESG & Reputation Committee

Supports decision making on significant sustainability and reputation related matters. Approves or key sustainability positions.

ESG Council

Supports coordination and prioritisation of group-wide ESG priorities.

Group Departments with Sustainability Responsibilities

Informs

Participating Group departments in committees (including papers):

- ESG Risk
- ESG Disclosure and Reporting
- Divisions
- Group Sustainability
- Group Property, Procurement and Protective Services

For more information, refer to our [2024 Annual Report](#).

BT

BT is governed by two separate Boards, the Superannuation Board (BT Funds Management Limited) and the Funds Board (BT Portfolio Services Limited and Westpac Financial Services Limited) which are comprised of Independent Non-Executive Directors.

The BT Boards have oversight of BT's approach to human rights and modern slavery. They also review and approve the adoption of policies including the SRMF and the Investment Governance Policy which sets out the way investment options are made available and investment monitoring is performed.

The day-to-day management and implementation of these policies is the responsibility of BT's CEO and is delegated to senior management.

WNZL

During FY24, WNZL's Human Rights Working Group (formerly Modern Slavery Working Group), focused on building the capacity of key teams across WNZL to identify and manage risks of modern slavery and human rights issues, including monitoring any further developments in relation to potential legislation on modern slavery reporting.

WNZL has also implemented an internal three year Human Rights Action Plan aligned to the Group [Human Rights Position Statement and Action Plan](#). During FY24, WNZL focused on understanding salient human rights issues (through the Group HRRA) and strengthening the foundations of its human rights approach. In FY25, WNZL will seek to progress strategic focus areas through:

- Conducting an effectiveness review of existing grievance mechanisms against the UNGPs effectiveness criteria.
- Providing support for vulnerable customers by facilitating access to safe and equitable banking services.
- Proactively educating marginalised communities about the risk of financial exploitation..



SUSTAINABILITY RISK MANAGEMENT

Our SRMF sets our approach to managing sustainability (including human rights) risks and supports the Board-approved RMF which describes our approach to managing material risks.

The SRMF is supported by a range of Group-wide policies which set out our approach to managing, monitoring and reporting on social risk, including in our lending and supply chain. Examples of our approach to managing sustainability risk include:

- Assessment of social risk (including human rights and modern slavery risk) in divisional risk profiles in line with the Risk and Control Assessment Policy. Where divisions assess social risk as high or above, they are required to respond to the risk and report progress to Divisional or Group Risk Committees.

- Assessment of social impact of incidents and issues to consider harm to people or communities resulting from risk management failures in line with the Incident Management Policy and the Issue and Action Management Policy.
- Management of credit related sustainability risks are considered in line with the Group ESG Credit Risk Policy (refer to *Lending* above).

During FY24, our 2nd line of defence ESG Risk team⁶² also provided guidance to support divisional assessments of salient human rights issues identified through the HRRR in their risk profile assessments.

WNZL

WNZL has its own Board-approved RMF and risk-class specific Risk Management Frameworks. Human rights risks are identified in line with WNZL's SRMF and ESG Credit Risk Policy.

TRAINING AND CAPABILITY BUILDING

We recognise the importance of training to support our people in understanding the role they play in managing risk and driving clearer accountability and decision making. Through our **Human Rights Position Statement and Action Plan** we are committed to providing human rights (including modern slavery) training. During FY24, modern slavery training was available to employees including:

- **Responsible Sourcing:** available for employees involved in sourcing, procurement or supplier management activities to support purchasing decisions, raise awareness of how to identify and manage sustainability risks (through the Responsible Sourcing Program) and promote respect of human rights and protection from modern slavery in our supply chain.
- **Financial Crime Risk Awareness:** mandatory for all employees – to build employee capability in identifying, mitigating and managing financial crime risk and exposures (including modern slavery), financial crime 'red flags' and situations requiring UMRs.
- **Managing ESG Risk:** available for employees working across ESG and focused on the fundamentals of managing ESG risk through the provision of products and services. It includes a case study on modern slavery.

- **Modern slavery awareness:** available for all employees and focused on modern slavery fundamentals including modern slavery examples, risk indicators and resources to support escalation of potential modern slavery.

In FY25 we aim to continue to enhance existing training and development programs to help strengthen the foundations of our broader human rights approach.

PROGRESS IN FY24

- Provided employees working in ESG and targeted risk roles the opportunity to attend human rights training facilitated by Shift (through our engagement with the Shift Financial Institutions Practitioners Circle).
- Launched a pilot across WNZL which delivered enhanced ESG training to specialist employees who support the identification and assessment of ESG (including human rights and modern slavery) risks.
- WNZL's Extra Care team delivered refreshed training (including human rights and modern slavery) to customer facing and specialist vulnerability teams. World Vision New Zealand shared insights on modern slavery risk in supply and value chains for the finance sector.

62. Line 2 Risk function under the Group's three lines of defence operating model.

ENGAGEMENT AND ADVOCACY

We recognise the importance of collaboration and sharing learnings in addressing modern slavery. We continue to apply learnings across our value chain to continuously improve and collectively tackle modern slavery.



UN Environmental Program – Finance Initiative (UNEP FI) and UN Principles for Responsible Banking

We participate in the Human Rights Community of Practice, which focuses on peer-led learning and addressing human rights risks. We support the Principles for Responsible Banking, aligning the purpose of banking with delivering against the United Nations Sustainable Development Goals and the Paris Climate Agreement.



UN Global Compact Network Australia

We are a member of the UN Global Compact Network Australia and actively participate in the Modern Slavery Community of Practice and the Human Rights Due Diligence Working Group. We also participated in the 2024 Australian Dialogue on Business and Human Rights. We have reported on our progress against the UNGC's Ten Principles annually since 2002 – refer [here](#).



Fintel Alliance

We are a member of AUSTRAC's Fintel Alliance, a public-private partnership tackling serious and organised crime, including child sexual exploitation and forced sexual servitude. This platform enables collaboration with industry, law enforcement, and regulators to address these crimes directly and indirectly, fostering broader engagement on financial crime solutions.



International Centre for Missing and Exploited Children (ICMEC)

This year we extended our \$25 million partnership with ICMEC Australia for an additional two years. Initially a three-year initiative, the partnership aims to break down barriers of the payment industry to identifying child sexual exploitation by fostering industry collaboration to share information and data for identifying suspicious transactions and supporting investigations.



On Us: Australian Business Coalition for Safeguarding Children

Westpac is a founding member of the On Us coalition, launched in November 2023. The coalition, including IHG Hotels and Resorts, GPT Group, Tik Tok and TBWA, is a cross-sector initiative to strengthen the capability and commitment of Australian businesses to safeguard children and young people.



Shift Financial Institutions Practitioners Circle

Shift is the leading centre of expertise on the UNGPs. We are a member of Shift's network of private banks and export credit agencies designed to co-create innovative approaches to advance leading practice for human rights. During FY24, Shift provided human rights and due diligence knowledge uplift to our employees working in ESG and targeted risk roles.



Responsible Investment Association of Australasia (RIAA)

BT is a member of RIAA which is helping to drive stronger responses to modern slavery risk.

4. GRIEVANCE MECHANISMS AND REMEDIATION

We are committed to providing or participating in effective grievance mechanisms, and to providing for or cooperating in the remediation of adverse human rights impacts that we identify we have caused or contributed to. We also recognise that we may be able to play a role in remedying abuses and violations where we are directly linked to an adverse impact.

In our [Human Rights Position Statement and 2026 Action Plan](#), we further commit to taking action to strengthen our grievance mechanisms where appropriate and necessary. During FY24, we continued to make good progress including developing internal guidance on effective human rights grievance mechanisms for use by owners of existing complaints mechanisms, as well as assessing the effectiveness of our existing complaints mechanisms – refer to *Case study: Assessing effectiveness of our grievance mechanisms* below. Our current feedback, complaints and grievance mechanisms include:

WESTPAC WHISTLEBLOWER POLICY

The Westpac Group [Speaking Up Policy](#) encourages current and former employees (including contractors, temporary employees and secondees), brokers, service providers and suppliers (including their current and former employees) to raise any concerns about our activities or behaviours that may be unlawful or unethical, including human rights and modern slavery concerns.

The [Speaking Up Policy](#) outlines how eligible persons can speak up under the policy. For our current employees, this may be via their People Leader or dedicated specialist human resources and risk teams.

EMPLOYEE GRIEVANCE PROCESS AND WORKPLACE MATTERS

Employees are actively encouraged to speak up about concerns or risks impacting them or others in the workplace, including sexual harassment, discrimination, bullying or harassment, health, safety and wellbeing (HSW), compliance and/or matters that may impact our customers, or other human rights concerns. Westpac policies, practices, training and reporting processes enable the reporting and addressing of raised concerns, including prompting a formal workplace investigation by a specialist Human Resource (HR) and/or HSW team when required.



Employees can raise a concern (including anonymously) via our usual business channels, including via their People Leader, HSW hazard and incident management system and/or dedicated channels managed by specialist human resources and risk teams. Former employees can raise historical workplace concerns by contacting a senior leader or the HR Service Centre, and these concerns are referred to the relevant HR team for review and resolution.

Employees in Australia can also raise concerns about matters arising under the Westpac Group Enterprise Agreement (EA) or National Employment Standards in accordance with the disputes process under our EA. Employees may appoint a representative at any stage of the dispute resolution process, including a union, legal or other representative.

FEEDBACK AND COMPLAINTS PROCESS

We strive to provide the best possible service for our customers and to do our best to resolve any concerns, including human rights concerns, quickly and fairly.

Our public **Complaints Policy** provides guidance on how customers may provide feedback or lodge a complaint. Guidance is also available for customers with accessibility requirements, in various languages, and in an **'Easy English Guide'**, which can be found on our **'Feedback and complaints'** website.

Customers can raise feedback or a complaint:

- By calling us. Telephone numbers are set out in the **Complaints Policy**.
- Online via Internet Banking or our banking app.
- By emailing us at: **westpaccustomer.solutions@westpac.com.au** or by writing to us. Our postal address is set out in the **Complaints Policy**.
- In-person by visiting us in a branch or speaking to a Relationship Manager or Private Banker.
- By calling the **Indigenous Call Centre** team at Yindyamarra.
- By calling the **National Relay Service**.

The Group also has a **Customer Advocate** who can be contacted by completing a **secure feedback form**. Their role is to listen to customers and recommend changes to bank policies, procedures and processes where appropriate.

Customers and members of the public (including those who may be impacted through a Westpac business partner, such as a customer) are also able to raise feedback or a complaint online via Westpac's **'Feedback and Complaints'** form. Feedback and complaints can also be received via social media or independent bodies such as the Australian Financial Complaints Authority (AFCA) and Australian Human Rights Commission.

SUSTAINABILITY-RELATED FEEDBACK AND COMPLAINTS

Any member of the public (including those who may be impacted through a Westpac business partner, such as a customer) is able to raise feedback and complaints about sustainability-related matters, including human rights and modern slavery concerns linked to our operations, products or services.

Anyone can raise a concern by contacting the Westpac Group Sustainability team at **sustainability@westpac.com.au**.



CASE STUDY

Assessing the effectiveness of our grievance mechanisms

During FY24, we progressed actions set out in our Human Rights Action Plan to strengthen the effectiveness of our grievance mechanisms. This included conducting a deep dive assessment of our existing grievance channels against the UNGPs effectiveness criteria.⁶³ The assessment prioritised areas of highest potential adverse human rights impacts including children and young people and those impacted through financing.

We identified a number of opportunities to continue to strengthen the effectiveness of our existing grievance mechanisms, including for those who are more vulnerable to or who may face barriers to accessing our mechanisms. This included human rights specific grievance training and uplift to existing escalation processes and supporting guidance. We have commenced work on these and expect them to be implemented in FY25.

63. With reference to the effectiveness criteria for non-judicial grievance mechanisms set out in the UNGPs, in particular UN Guiding Principle 31, which outlines that grievance mechanisms should be legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on engagement and dialogue.

5. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS AND FUTURE FOCUS

We believe an effective response to modern slavery is one where our governance, policies and processes enable us to identify and mitigate modern slavery risks in our operations, supply chain and business relationships, and respond appropriately to any allegations or incidents that arise.

We measure the effectiveness of our modern slavery actions in line with our modern

slavery Monitoring and Evaluation (M&E) Framework. The Framework includes measures centred around five core areas: governance and policy commitment; human rights due diligence; stakeholder engagement and advocacy; training and capability building; and grievance mechanisms and remediation. This year we streamlined the measures in our Framework to focus on the most critical elements of our modern slavery approach.

In FY25 we aim to progress our commitment from our [Human Rights Position Statement and 2026 Action Plan](#) through continuing to strengthen the foundations of our human rights approach to drive improved progress, performance and risk management by developing a human rights M&E Framework to enhance our tracking and reporting of human rights and modern slavery impact, performance and effectiveness.

Assessing the effectiveness of actions to manage modern slavery risk continues to be a challenge for many organisations. We continue to integrate key learnings and external stakeholder feedback as we seek to mature our approach. The table below outlines the key outcomes against each of our measures and the areas we will continue to focus on in FY25.

Core area of an effective modern slavery approach	Measure	Key outcomes in FY24	How this helps us to assess effectiveness	FY25 focus
GOVERNANCE AND POLICY COMMITMENT	Governance processes are in place that ensure senior leadership and management have regular oversight of our human rights and modern slavery approach, commitments and any emerging or high risk issues.	- Divisional Risk Committees consider human rights dimensions of business activities (as required), including action plans to address high risk matters. - The Institutional and Business and Wealth CTREC's considered escalated customer transactions for enhanced ESG due diligence. - Internal reporting templates were strengthened in FY24 to improve the monitoring and reporting of human rights and modern slavery risk.	Governance processes and senior leadership oversight supports implementation of our commitments, monitoring of risk trends and root causes, and help us to make sound risk-based decisions.	Continue to progress commitments and actions set out in our Human Rights Position Statement and Action Plan , including our work to better incorporate our commitments and approach into internal processes, business controls and risk management policies and practices across our Group locations.
	Frameworks, policies, procedures and standards are in place to manage human rights risk, including modern slavery.	- Refer to <i>Policy commitment in Section 3 – Our actions to identify, assess and address modern slavery risks</i> above. - Institutional and Business and Wealth ESG specialist teams and other specialist teams supported the review and implementation of sustainability policies and processes and the investigation of high risk matters.	Review and implementation support from specialist teams help us to evaluate whether our policies and processes are fit-for-purpose and reflect the needs and risk profiles of our business and stakeholders.	
	Progress against our commitments and actions set out in our Human Rights Position Statement and Action Plan .	Refer to <i>Section 1 – Our commitment to human rights and continuous improvement</i> above for key progress against our Human Rights Position Statement and Action Plan commitments and actions in FY24.	Progress monitoring helps us understand how we are tracking against the areas of our human rights approach that we have identified for improvement.	

Core area of an effective modern slavery approach

HUMAN RIGHTS DUE DILIGENCE

Measure	Key outcomes in FY24	How this helps us to assess effectiveness	FY25 focus
Number of suspicions or disclosures of modern slavery escalated and investigated through our Financial Crime risk assessment processes. ⁶⁴	1,361⁶⁵ matters were identified and escalated through our Australian transaction monitoring processes and referred to AUSTRAC due to concerns regarding modern slavery (including sexual servitude, forced labour, sextortion and human trafficking) or child exploitation. We do not have visibility of AUSTRAC's investigation (if any) of these matters. 33 matters were identified and escalated through WNZL's customers transaction monitoring processes due to concerns regarding modern slavery (including child exploitation, domestic child exploitation and exploitation). These matters were referred to the New Zealand Police Financial Intelligence Unit (FIU). WNZL does not have visibility of the FIU's investigations (if any) of these matters.	Our financial crime monitoring and reporting processes ensure we investigate suspected cases of modern slavery and other human impact crime and report to regulators and law enforcement as required. Monitoring escalations helps us understand trends and identify required improvements our to policies or processes.	- Continue to enhance our customer ESG risk assessment tools and supplier Responsible Sourcing tools, to support improved assessment of our salient human rights risks and the higher risk sectors and spend categories that were identified in Phase 1 of our HRRRA. - Continue to progress commitments and actions set out in our Human Rights Position Statement and Action Plan including: - Progression of Phase Two of our HRRRA, focused on identifying our salient human rights issues and human rights risks across our broader financial products and services, employment practices and community partnerships. - Development of a human rights impact M&E framework to enhance our approach to tracking and reporting on our human rights and modern slavery impact, performance and effectiveness. - Review and continue to strengthen our ongoing supplier due diligence activities across high risk categories including considering uplift to support verification of supplier self-assessments.
Number of institutional or business customer transactions with high modern slavery risk escalated for review by our ESG specialist teams.	59 customers were escalated to the Institutional ESG specialist team for further due diligence or customer engagement (as required) due to modern slavery risk. 1 customer connection with modern slavery risk was identified and referred to the Business and Wealth ESG specialist team for further due diligence or customer engagement (as required). 4 customers were escalated to the WNZL's ESG specialist team for further due diligence or customer engagement (as required) due to modern slavery risk.	Escalation processes help ensure we investigate and mitigate transactions identified with high modern slavery risk, including through further due diligence and/or customer engagement. Monitoring escalations helps us understand and respond to customer trends.	
Number and status of priority supplier action plans (Responsible Sourcing Action Plans).	During FY24, 53 new priority action plans were created of which 38 were resolved. The remaining 15 plans will be actively managed with the suppliers into FY25.	Action plans support us to work with suppliers to influence and manage potential gaps in their modern slavery approaches.	
Additional due diligence is conducted for higher risk supplier categories.	Refer to <i>Case study: Ongoing due diligence of indirect suppliers</i> in Section 3 – Our actions to identify, assess and address modern slavery risks above.	Ongoing due diligence builds our understanding of potential modern slavery risks, including with indirect suppliers. It also helps us understand how our expectations are being implemented by suppliers, where our approach is working and where we have opportunities to improve.	

64. Includes matters that were identified through our grievance channels and reported to financial crime through unusual matter reporting processes.

65. Compared to 392 matters in FY23. The increase in matters referred to AUSTRAC under the modern slavery typology in FY24 was due to policy updates where child exploitation typologies (that were previously separate) were integrated into the broader modern slavery typology.

Core area of an effective modern slavery approach	Measure	Key outcomes in FY24	How this helps us to assess effectiveness	FY25 focus
STAKEHOLDER ENGAGEMENT AND ADVOCACY	Improved reach and effectiveness of programs and services for children at risk.	- Over \$77m granted by the SCSC program since 2020 (including \$17m in FY24) to help safeguard children in Australia and Asia. - SCSC funding helped our partners reach over 69,000 children, young people and adults in FY24, through various programs in Australia, the Philippines, Thailand and Cambodia. This includes 49 child victim rescues supported by IJM in the Philippines.	Progress monitoring under the SCSC program helps us to understand whether our funding has been effective in helping to safeguard children in Australia and in Asia-Pacific countries where children are at highest risk from sexual exploitation and online sexual exploitation.	Continue to monitor progress of our partners on the delivery of their work programs aimed at combatting sexual exploitation of children. This includes seeking to improve reach and effectiveness of services for children at risk of sexual exploitation and abuse.
TRAINING AND CAPABILITY BUILDING	Employees working in teams where modern slavery is most likely to be identified or escalated receive targeted modern slavery training.	Refer to <i>Training and capability building</i> in <i>Section 3 – Our actions to identify, assess and address modern slavery risks</i> above.	Providing targeted training helps us understand the capacity of our people to identify risks and respond to modern slavery where it may arise across our operations or supply chain.	- Deliver ESG Board training (including human rights and modern slavery) to the BT and Westpac PNG Boards. - Review current human rights and modern slavery training programs and identify areas to strengthen existing programs.
GRIEVANCE MECHANISMS AND REMEDIATION	Number of grievance channels reviewed and strengthened to increase effectiveness of our grievance mechanisms and approach to remedy.	During FY24, we conducted a deep dive assessment of our existing grievance channels against the UNGPs effectiveness criteria. Refer to <i>Case study: Assessing effectiveness of our grievance mechanisms</i> in <i>Section 4 – Grievance mechanisms and remediation</i> above.	Our review processes help us understand where our mechanisms are working and where we have opportunities to strengthen the way we receive, monitor and respond to human rights grievances, including concerns of modern slavery.	Continue to progress commitments and actions set out in our Human Rights Position Statement and Action Plan including: - Implementation of human rights specific grievance training and uplift to existing escalation processes and supporting guidance, as commenced in FY24. - Prioritising uplift and actions to strengthen our grievance mechanisms and approach to remedy across areas of highest risk for adverse human rights impacts.

6. REPORTING ENTITIES AND APPROVAL

CONSULTATION WITH REPORTING ENTITIES

During FY24, our Sustainability team and internal subject matter experts engaged and consulted with the relevant divisions and risk teams (including divisional representatives who cover our owned and controlled entities) on the Group's approach to identifying, assessing and managing modern slavery risk across the business (including supporting tools and resources) and the requirements and preparation of this Statement.

Divisions engaged the Directors of all identified reporting entities (or where the entity was a trust, of the relevant trustee) to inform them of their obligations under the Australian Modern Slavery Act and offered guidance on the reporting obligations where required. All of those entities endorsed participation in this joint Statement prepared on their behalf by Westpac Banking Corporation (in accordance with the joint reporting requirement of section 14 of the Australian Modern Slavery Act). A final draft statement was made available to the reporting entities' nominated representatives before its publication.

For reporting entities which are trusts with a trustee external to Westpac, Westpac consulted with the trustee

through correspondence regarding the joint Statement and the Australian Modern Slavery Act. Our approach to consultation has been formalised in guidance documents which outline the obligations of reporting entities and the role of divisions in supporting the preparation of the Statement and consultation with reporting entities.

The Boards of the BT reporting entities have approved the inclusion of these entities in the joint Statement during the reporting year. Management representatives of these entities have been involved in the Group-wide consultation process and participated in the drafting of this Statement.

OVERVIEW OF REPORTING ENTITIES AND APPROVALS

The following tables provide an overview of each reporting entity (including investment trusts) covered by this Statement including approving Boards.⁶⁶

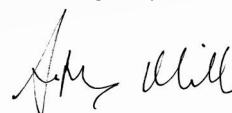
66. There are 14 reporting entities for the purpose of the Australian Modern Slavery Act. As there is no single higher entity for all reporting entities and it was not practicable to seek approval from each reporting entity (due to their governance structure and complexities around both the timing and requirements of Board meetings), this statement was approved by the respective Boards of Westpac Banking Corporation, BT Funds Management Limited (BTFM), and BT Portfolio Services Limited (BTPS) and Westpac Financial Services Limited (WFSL), and signed by a responsible member of each of those Boards.

67. Trust with a trustee external to Westpac.

WESTPAC BANKING CORPORATION

Reporting entity	Principal activities during reporting period
1. Westpac Banking Corporation (ABN 33 007 457 141)	Westpac Banking Corporation is the parent entity of the Westpac Group. The principal activities of the Group were the provision of financial services including lending, deposit taking, payments services, investment platforms, superannuation and funds management, insurance services, leasing finance, general finance, interest rate risk management and foreign exchange services.
2. Capital Finance Australia Limited (ABN 23 069 663 136)	The principal activities of the company were the provision of plant and equipment finance facilities as well as consumer finance facilities including leasing, commercial hire purchase, and commercial loans/ chattel mortgages.
3. Crusade Trust No.2P of 2008 (ABN 54 656 327 299)	The Trust is used for the purpose of securitising St.George, Bank of Melbourne and BankSA brand home loans.
4. RAMS Financial Group Pty Limited (ABN 30 105 207 538)	The principal activities of the company consisted of distributing RAMS branded residential home loans (ceased in August 2024) and deposit products for Westpac Banking Corporation, acting as the franchisor to RAMS home loan franchisees, and supporting the ongoing management of RAMS home loans and products.
5. Series 2008-1M WST Trust (ABN 55 776 534 334) ⁶⁷	The Trust is used for the purpose of securitising Westpac brand home loans.
6. Westpac Covered Bond Trust (ABN 41 372 138 093) ⁶⁷	The Trust is used to provide a financial guarantee in respect of all interest and principal payable under the terms of the covered bonds issued, from time to time, by Westpac.
7. Westpac Equity Holdings Pty Limited (ABN 77 003 018 559)	The principal activity of the company consisted of holding of investments.
8. Westpac Financial Services Group Pty Limited (ABN 50 000 326 312)	The principal activity of the company was that of a holding company for its controlled wealth entities. The wealth business includes the design and manufacture of financial products for sale to retail and wholesale customers in Australia. The company also provides administration and support services to its controlled and related entities.
9. Westpac Overseas Holdings No. 2 Pty Limited (ABN 90 121 257 510)	The principal activities of the company consisted of holding of investments.
10. Westpac Securitisation Holdings Pty Limited (ABN 95 112 457 762)	The principal activities of the company consist of managing investments in a Westpac Securitisation Trust.

This Statement was approved on 7 March 2025 by the Board of Westpac Banking Corporation.



Anthony Miller
Managing Director and Chief Executive Officer

BT FUNDS MANAGEMENT LIMITED

Reporting entity	Principal Activities during reporting period
11. BT Funds Management Limited (ABN 63 002 916 458)	The company is both a Registrable Superannuation Entity (RSE) Licensee and trustee of an unregistered managed investment scheme. The principal activities of the company were the provision of trustee services.

12. Asgard Independence Plan – Division 2 (ABN 90 194 410 365)	Superannuation fund.
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The Statement was approved on 6 February 2025 by the Board of BT Funds Management Limited.



Michael Cottier
Chair, BT Funds Management Limited

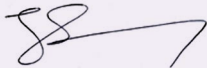
BT PORTFOLIO SERVICES LIMITED

Reporting entity	Principal Activities during reporting period
13. BT Portfolio Services Limited (ABN 73 095 055 208)	The principal activities of the company were the provision of the client investment administration services and back-office administration services.

WESTPAC FINANCIAL SERVICES LIMITED

Reporting entity	Principal Activities during reporting period
14. BT Managed Portfolios (ARSN 604 066 686)	Investment trust.

The Statement was approved on 5 February 2025 by the Boards of BT Portfolio Services Limited and Westpac Financial Services Limited (as the principal governing body of BT Managed Portfolios).



Jonathan Sweeney
Chair, BT Portfolio Services Limited and Westpac Financial Services Limited

Appendix 1: Additional policies and frameworks

Additional policies and frameworks that support our broader approach to managing ESG and modern slavery across our operations and supply chain include:

Activity	Policy/Process Document	Purpose
As a financial services provider	Group Complaints Management Policy	Sets our approach to appropriately and consistently managing complaints across the Group.
	Incident Management Policy	Sets our approach to managing incidents across the Group, including incidents with social impact (including human rights and modern slavery).
As an employer	Group Remuneration Policy	Outlines our approach to remuneration including our commitment to providing market competitive and equitable pay.
	Group Recruitment Policy	Outlines our approach to recruitment, including our commitment to fair and ethical recruitment.
	Australian Enterprise Agreement	Outlines terms for employees relating to pay, leave, working hours, flexibility, staffing, dispute resolution, and leaving the company.
As a purchaser of goods and services	Group Outsourcing Policy	Sets the minimum standards required to manage third party and prudential compliance risks associated with outsourcing business activities.
	WNZL Supplier Management Policy	Sets out the principles underlying WNZL's approach to Supplier Management. It establishes the structure for managing supplier relationships and risk.
	WNZL Procurement Policy	The WNZL Procurement Policy sets out the key principles governing the approach when procuring goods and services from a supplier (including related entities). The policy provides clear guidance on the procurement process which guides decision making for either market-based engagements or when WNZL engages the services of an affiliate or subsidiary of another Westpac entity.
	WNZL Responsible Sourcing Principles	Principles that will underpin the way WNZL approaches purchasing decisions to ensure sustainable outcomes for communities, customers and suppliers.

Contact us

For questions and comments, please contact Westpac Group Sustainability:

✉ sustainability@westpac.com.au

💻 westpac.com.au/sustainability

Accessibility support

Westpac welcomes calls through the **National Relay Service**. If you are deaf, hard of hearing, or have speech/communication difficulty, choose your access option detailed on the National Relay Service.

Where English is a second language, contact us and a banker can arrange a language interpreter.

Visit **Westpac Access and Inclusion** for further information on our more accessible products and services for people with disability, who are neurodivergent or where English is a second language.

