

Purpose

Wade Group is committed to conducting business ethically, responsibly, and with integrity. We have a zero-tolerance approach to modern slavery in any form and are committed to respecting and protecting human rights across our operations and supply chains.

All employees, contractors, suppliers, and business partners share responsibility for supporting this commitment and acting in a way that upholds Wade Group's values.

The purpose of this policy is to:

- Set out Wade Group's position on modern slavery
- Outline the steps we take to prevent modern slavery within our operations and supply chain
- Provide guidance on identifying and reporting concerns

Application

This policy applies to:

- All Wade Group employees (permanent, fixed-term, and casual)
- Contractors, labour hire workers, and consultants
- Suppliers, vendors, and business partners

Policy Commitment

Wade Group has a zero-tolerance approach to modern slavery.

We are committed to:

- Acting ethically and with integrity in all business dealings
- Ensuring our employment practices comply with New Zealand employment law
- Taking reasonable steps to ensure our supply chain is free from modern slavery practices
- Supporting a culture where concerns can be raised safely and without fear of retaliation
- Continuously improving our approach to identifying, preventing and responding to modern slavery risks.

Definition of Modern Slavery

Modern slavery refers to situations where individuals are exploited and cannot refuse or leave due to threats, violence, coercion, deception, or abuse of power.

This includes, but is not limited to, conduct which is defined as 'modern slavery' under Modern Slavery Bill 2026, examples include,

- Human trafficking
- Slavery or servitude

- Forced or compulsory labour
- Forced marriage
- Debt bondage
- The worst forms of child labour

Prevention and Due Diligence Employment Practices

Wade Group is committed to fair and lawful employment practices, including:

- Verifying the legal right to work for all employees
- Providing written employment agreements
- Paying wages and entitlements in accordance with New Zealand laws
- Never charging recruitment or placement fees to employees (directly or indirectly)
- Ensuring employees are free to leave employment after reasonable notice

Supply Chain Management

Wade Group takes reasonable steps to identify and manage modern slavery risks within its supply chain, including:

- Conducting due diligence on suppliers
- Including modern slavery and ethical conduct clauses in supplier agreements where appropriate
- Reviewing supplier practices where concerns are identified

Training and Awareness

- Employees are expected to remain alert to potential modern slavery risks
- Training and awareness may be provided to relevant roles to help identify and report red flags

Identifying Modern Slavery Risks

Modern slavery indicators may include (but are not limited to):

- Workers appearing fearful, withdrawn, or unable to speak freely
- Withholding of identity documents
- Excessive working hours with little or no pay
- Unsafe or poor working conditions
- Restricted freedom of movement

Any concerns, even if uncertain, should be reported.

Reporting Concerns

Any employee or contractor who suspects a breach of this policy or identifies potential modern slavery risks must report the concern as soon as practicable.

Reports can be made through:

- People & Culture Lead
- General Manager
- Department Manager
- Wade Group’s Whistleblower process (Contact details are provided below. Please refer to the Whistleblower Policy for further information.)

Reports may be made confidentially and, where permitted, anonymously. Wade Group will not tolerate retaliation against anyone who raises a concern in good faith.

Remediation

Where modern slavery is identified or reasonably suspected, Wade Group will take appropriate steps to support affected individuals and address the issue. This may include working with suppliers to improve practices, engaging relevant authorities where required, and ending business relationships where remediation is not possible.

Breaches of Policy

Any breach of this policy will be treated seriously. Employees found to have breached this policy may be subject to disciplinary action in line with the Employee’s Individual Employment Agreement and Wade Group’s Performance Management Policy, up to and including termination, and where appropriate, legal action.

Where suppliers or contractors are found to be in breach, Wade Group may take appropriate action, including remediation, suspension, or termination of the business relationship.

Contacts

For advice or to raise a concern, contact:

General Manager	pele@wadegroup.co.nz
People & Culture Lead	josie@wadegroup.co.nz
Whistleblower/ Speak UP Service (via Raise EAP services)	0800 000 457 / Whistleblower (Speak Up Service)

Review Protocol:	
Policy Owner:	People and Culture Lead
Approved By:	Managing Director/Executive Team
Policy Reviewed By:	Management Team
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Next Review Date:	May 2028