

Human Rights Policy

Reviewed: October 2026

Our Commitment

Wilson Security is committed to respecting internationally recognised human rights and to complying with applicable laws in the jurisdictions in which we operate. This includes laws relating to employment, workplace relations, discrimination, work health and safety, privacy, modern slavery, bribery and corruption, and environmental protection.

This Policy sets out our approach and the expectations that apply to our employees and, where relevant, contractors, suppliers and other business partners. We seek to give effect to this commitment through proportionate, risk-based governance, due diligence, training, monitoring, reporting and remediation measures. Responses to substantiated non-compliance may include corrective, contractual or disciplinary action, as appropriate and in accordance with applicable law and procedural fairness.

In developing this Policy, we have had regard to applicable law and the following internationally recognised standards:

- The Universal Declaration of Human Rights;
- The United Nations Guiding Principles on Business and Human Rights, founded on the UN's 'Protect, Respect and Remedy' framework;
- The International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, as these conventions are underpinned by the four United Nations Global Compact Labour Principles; and
- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

Wilson Security does not tolerate modern slavery in its operations or supply chain, including forced labour, debt bondage, deceptive recruitment, human trafficking and the worst forms of child labour. We seek to identify, assess, prevent and mitigate relevant risks through due diligence, monitoring, training and assurance activities that are proportionate to the nature and severity of the risk.

Where we identify that we have caused or contributed to an adverse impact, we will seek to provide for or cooperate in appropriate remediation; where an impact is directly linked to our operations, products or services through a business relationship, we will seek to use available leverage to encourage prevention or mitigation.

Guiding Principles

At Wilson Security, we recognise the dignity of every person and our responsibility to respect internationally recognised human rights. Subject to applicable law and legitimate operational requirements, we aim to avoid causing or contributing to adverse human rights impacts and to address impacts with which we are involved. Relevant rights and principles include:



- Respect for internationally recognised human rights, including life, dignity and security of person
- Right to liberty and security of person
- The right to physical and mental health
- Right to privacy
- Right to freedom of thought, conscience and religion
- Right to freedom of opinion and expression
- Right to participate in cultural life
- Freedom from unlawful discrimination, harassment, sexual harassment, victimisation and abuse
- Right to work, including access to training and education
- Right to just and favourable working conditions
- Freedom from forced or compulsory labour, debt bondage and human trafficking
- Fair and responsible recruitment practices, including no recruitment fees charged to workers where prohibited by law or applicable standards
- Right to freedom from child labour, including the worst forms of child labour
- Freedom of movement, including freedom from unlawful retention of identity or travel documents
- Right to freedom of association & collective bargaining
- Right to rest and leisure
- Freedom from torture and other cruel, inhuman or degrading treatment or punishment

Objectives

This Policy is supported by other policies and processes across our operations, including those relating to people and culture, work health and safety, equal employment opportunity, privacy, procurement, contractor management, whistleblowing and modern slavery. Nothing in this Policy limits any rights or obligations arising under applicable law, an industrial instrument or a contract.

We aim to develop our business and our people management practices based on the following internationally recognised Human Rights principles.

Through implementation of this Policy, we aim to:

1. Develop, review and, where reasonably practicable, improve our approach to respecting the human rights of employees, contractors, customers and workers in our supply chain;
2. Identify, assess and respond to actual and potential human rights impacts within our operations, business relationships and supply chain;
3. Apply proportionate, risk-based screening and due diligence when selecting and managing customers, suppliers, contractors and other business partners, and consider appropriate responses where their practices are inconsistent with this Policy;
4. Promote safe, healthy, respectful and inclusive workplaces and take reasonable and proportionate steps to prevent unlawful discrimination, harassment, sexual harassment, victimisation, forced labour and the worst forms of child labour;
5. Support freedom of association, collective bargaining and constructive engagement with employees, contractors and workers;
6. Conduct our business ethically and in accordance with applicable laws. Wilson Security does not tolerate bribery, corruption or other improper conduct and will respond to suspected or substantiated misconduct in accordance with applicable policies and law;



7. Encourage open dialogue, maintain accessible reporting channels and communicate material information about our approach and improvement activities, subject to legal, privacy, confidentiality and commercial requirements;
8. Undertake due diligence of contractors and suppliers that is appropriate to the nature, scale and risk profile of the relationship, and use available leverage to prevent, mitigate or address identified human rights and modern slavery risks; and

We give effect to this Policy through our governance framework, workforce practices, contractor management processes, supplier due diligence activities, training, grievance and reporting mechanisms. We periodically assess the effectiveness of relevant controls and responses, to the extent reasonably practicable, and review priorities having regard to the severity and likelihood of risks to people.

Maintaining a Human Rights Focus

We recognise that organisational structures, processes, legal requirements and risk profiles evolve over time. Wilson Security therefore periodically reviews this Policy and relevant practices to support their continuing suitability and effectiveness. Our approach to human rights is formal, consistent and risk-based, with priority given to the most severe actual or potential impacts on people.

We maintain our ongoing commitment to Human Rights through:

- Developing measures and reporting mechanisms to assess and address Human Rights and modern slavery risks
- Informing the development of relevant training and awareness initiatives
- Integrating Human Rights considerations into our governance framework, policies and business processes
- Conducting due diligence, monitoring and assurance activities across our workforce, contractors and supply chain; and
- Escalating identified impacts promptly and pursuing appropriate remediation or mitigation, having regard to our involvement, available leverage, the severity of the impact, procedural fairness and applicable law.

Accountabilities

The following table describes key accountabilities under the Wilson Group human rights and modern slavery governance framework. Responsibilities operate alongside applicable delegations, policies and legal duties:

Human Rights Accountability		
Board	Executive Sponsorship	Central Coordination
The Board provides oversight of the organisation's human rights and modern slavery approach, including consideration of material risks and statutory reporting presented for approval.	The Executive Leadership Team provides strategic direction, allocates appropriate oversight and considers material issues requiring executive attention.	The Group CEO may appoint a Modern Slavery Lead. The Modern Slavery Lead coordinates the Group framework, supports business unit activity and oversees the reporting process within approved authority and available resources.
Operational Implementation		
BU Modern Slavery Representatives Business Units are responsible for implementing applicable controls and providing relevant operational information within their areas of responsibility. Each Business Unit CEO may appoint a representative to coordinate implementation and delivery, with accountability remaining subject to the organisation's governance and delegation framework.		



Implementation is managed within each business unit, supported by the Wilson Group Modern Slavery Lead and relevant governance forums. The Group seeks to maintain a consistent framework while allowing controls to be adapted to each business unit’s operating model, workforce arrangements and risk profile.

Reporting

Employees, contractors, suppliers, customers and other stakeholders are encouraged to raise concerns about conduct that may be inconsistent with this Policy or applicable law. A person does not need to prove a breach before raising a concern and may report on reasonable grounds.

Concerns can be raised directly with a manager, senior manager or Human Resources. Concerns can also be raised confidentially and independently through the Wilson Group Speak Up Service:

Website	Confidential Hotline	Email
www.wilsongroupsspeakup.deloitte.com.au	1800 325 033	wilsongroupsspeakup@deloitte.com.au

Information on reporting options may be provided through onboarding, training, workplace communications and other appropriate channels. Reports will be handled confidentially as reasonably practicable, subject to legal obligations, procedural fairness and the requirements of an effective investigation.

Wilson Security prohibits retaliation against a person who raises a concern in good faith or on reasonable grounds and will address reports in accordance with the Wilson Group Speak Up Policy and applicable whistleblower protections.

Document Review

This Policy has the endorsement of the Wilson Security Senior Leadership Team and has been developed with input from relevant governance stakeholders. It will be reviewed periodically and may be updated earlier where there are material changes to law, operations, risk or stakeholder expectations. This Policy is a statement of intent and governance approach; it does not create contractual rights or obligations beyond those arising under applicable law, an industrial instrument or an express contractual term.

Nick Frangoulis
Chief Executive Officer
Wilson Security
Date: 1 October 2026