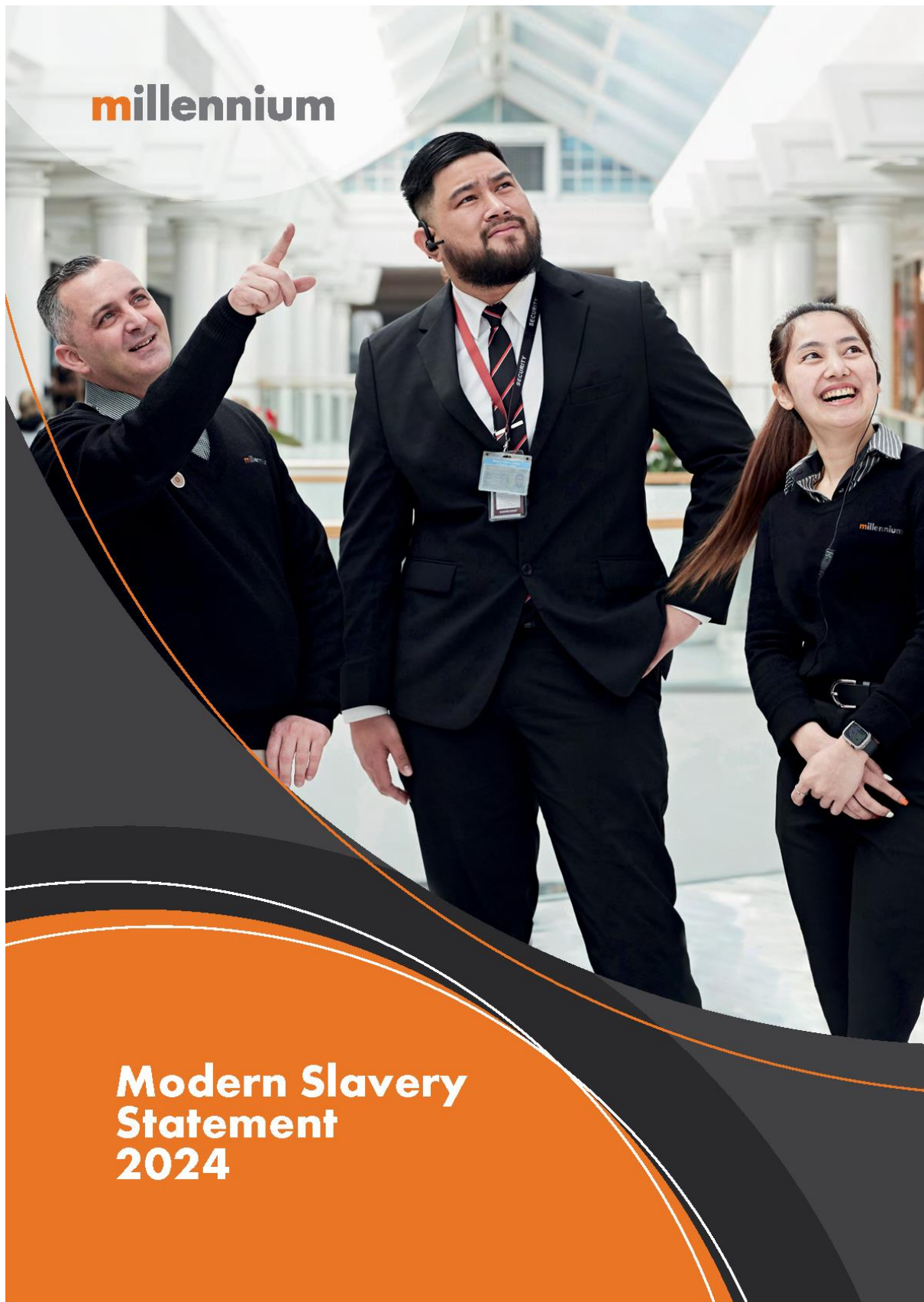




millennium



**Modern Slavery
Statement
2024**

MILLENNIUM SERVICES GROUP PTY LTD

Reporting Period: 01 January 2023 – 31 December 2023

Millennium Service Group ABN: 11 607 926 787

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ACKNOWLEDGEMENT OF COUNTRY

Millennium acknowledges the Aboriginal and Torres Strait Islander peoples as the first inhabitants and Traditional Owners and Custodians of Country throughout Australia. We pay respects to Elders past, present and future.



United: Our Reconciliation Journey. Lani Balzan, 2023

1. INTRODUCTION

This is the Fourth Modern Slavery Statement published by Millennium Services Group for the purposes of reporting under the Australian Modern Slavery Act 2018 (Cth.).



The Statement outlines the ongoing actions taken by Millennium Services Group Pty Ltd during the calendar year of 01 January 2023 – 31 December 2023 in order to minimise the risk of modern slavery within our internal operations and the supply chain.

For completeness, where our approach to modern slavery within our business structure, internal operations, and supply chain have remained the same over the reporting period, we have not restated the detailed information as laid out in our previous Statements, but instead have summarized or included references where applicable to initiatives undertaken in the previous reporting period for historical context and added any notable progress achieved post the previous reporting period, and prior to publishing this Statement for accuracy and currency.



This statement was drafted and prepared in consultation with the stakeholders of all reporting entities for Millennium Services Group via the People & Risk Committee, chaired by the Chairperson of the Millennium Board and represents a consolidated statement for all group companies.

Details regarding the reporting entities and stakeholders consulted during the process are outlined in the subsequent sections.

2. ABOUT THE STATEMENT

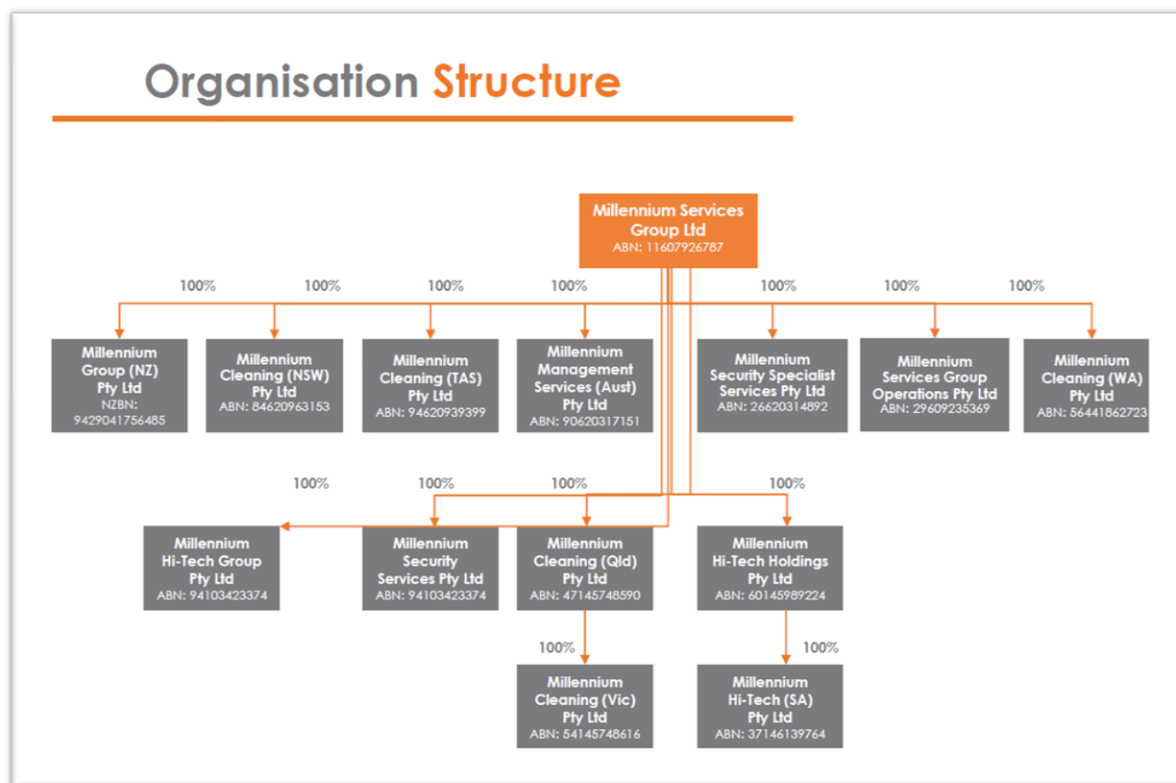
Modern Slavery Statement Criteria

Mandatory Criteria for Modern Slavery Statements	
Criterion 1	Identify the Millennium Services Group reporting entities.
Criterion 2	Describing Millennium Services Groups' structure, operations, and supply chains
Criterion 3	Describing the risks of modern slavery practices in the Millennium operations and supply chains
Criterion 4	Describing the actions taken by Millennium Services Group to assess, address these risks, including due diligence & remediation processes
Criterion 5	Describing how Millennium Services Group assesses the effectiveness of these actions
Criterion 6	Describing the process of consultation within Millennium Services Group and its entities any entities making the statement

This Statement is made on behalf of Millennium Services Group, ABN: 11 607 926 787 for the calendar year ended 31st December 2023. This statement has been prepared on a consolidated basis for Millennium together with its wholly owned subsidiaries.

- Millennium Management Services (Aust) Pty Ltd (ABN: 90 620 317 151)
- Millennium Management Services (WA) Pty Ltd (ABN: 17 088 255 412)
- Millennium Cleaning (Qld) Pty Ltd (ABN: 47 145 748 590)
- Millennium Cleaning (Tas) Pty Ltd (ABN: 94 620 939 399)
- Millennium Cleaning (NSW) Pty Ltd (ABN: 84 620 963 153)
- Millennium Cleaning (WA) Unit Trust (ABN: 56 441 862 723)
- Millennium Cleaning (Vic) Pty Ltd (ABN: 54 145 748 616)
- Millennium Security Specialist Services Pty Ltd (ABN: 26 620 314 892)
- Millennium Hi-Tech (SA) Pty Ltd (ABN: 37 146 13 9 764)
- Millennium Hi-Tech Group Pty Ltd (ABN: 94 103 423 374)
- Millennium Hi-Tech Holdings Pty Ltd (ABN: 60 145 989 224)
- Millennium Group (NZ) Ltd (NZBN: 94 290 417 564 85)

The relationship between the entities is depicted in the organisation structure represented below.



Millennium has consulted a wide range of internal and external stakeholders including Executive leadership Team members, Senior Managers, Suppliers, and Third-Party Organisations (such as NGO's, Auditors etc...) in preparing this Statement. Millennium provided the People & Risk Committee and members of the Board with a draft of this Statement prior to its publication. The Officers and Directors of the above listed entities were consulted in the preparation of this Statement.

This Statement and its disclosures only apply to co-ownership arrangements or co-venture investments in which the Millennium Services Group entity has operational control, either under the relevant co-ownership agreement or other governing document.

This Statement does not cover Codee Cleaning Services Pty Ltd, ABN: 24 128 058 006 although where possible we have set our expectations for alignment with our core standards, which include ongoing respect for human rights. Millennium Services Group has not consulted with the owners and management team of Codee Cleaning for the purpose of this Statement and does not make any representations about the supply chains, operations, or governance of this entity.

3. CHAIRMAN AND CEO MESSAGE

Throughout 2022/2023, Millennium continued to deliver excellent service to clients through our experienced and committed teams across Cleaning, Security, and Integrated Services. Whilst the operating environment has remained challenging with continued labour shortages in the first half of FY23 and inflationary cost pressures in the second half of FY23, Millennium has proven its resilience by growing, consolidating, and strengthening the business throughout the year.

It has been particularly pleasing to deliver on our commitments to the market concerning diversification and expansion into new services, industries and geographies, including our most recent expansion into the Northern Territory.

Business Sustainability

We are very conscious of community and customer expectations for responsible business practices and are committed to maintaining high standards of compliance, safety, and customer service. Our Board-led governance program ensures Millennium meets its legal, social, and ethical obligations.

Millennium recognises that in addition to operational excellence and economic performance, the progress and growth of the organisation requires the Company to pay attention and respond to Environmental, Social and Governance (ESG) factors. In FY23, Millennium developed an ESG snapshot document as a precursor to beginning a comprehensive corporate carbon accounting process in 2024 in anticipation of the expected regulated requirement for same by 2025.

As a people business, our team members are the lifeblood of the Company, and their safety and well-being is our priority. Millennium's lost time injury frequency rate continues to significantly outperform average industry rates. Our commitment to ensuring ethical treatment of employees begins with correct wage payments and extends well beyond this to aspects such as work-life balance and job security.

Millennium is committed to identifying and addressing risks and potential instances of Modern Slavery in our operations and supply chains. The Group prepares the Modern Slavery Statement annually capturing the identified risks and mitigation strategies together with activities it adopts in relation to prevention of Modern Slavery in its Internal Operations and Supply Chains.

The Millennium Board via the People & Risk Committee oversees the progress on Modern Slavery Risk activities and during the reporting period no specific examples of Modern Slavery were identified in our operations or supply chains.

In March 2023, Reconciliation Australia endorsed Millennium's Innovate Reconciliation Action Plan, and significant progress has been made with implementing the Plan in the first half of the 2023 calendar year. Our partnership with Codee Cleaning Services, an indigenous owned cleaning company, continues to evolve as we pursue opportunities to create value together.

As a people business, our team members are the lifeblood of the Company and their safety and wellbeing is our first priority.

We are committed to acting ethically and with integrity in all our business dealings and relationships and on implementing and enforcing effective systems and controls to prevent modern slavery within our own business and in our supply chains. Millennium also understands the key to eradicating this complex issue is to set clear expectations for our people and suppliers, educate and train them on the impacts of Modern Slavery and its prevention and ultimately alert us to potential involvement in Modern Slavery and empower us to take steps to address it and to prevent such involvement in the future.

The following sections provide details on Millennium's structure, supply chain, internal operations, and risk management process in relation to prevention of Modern Slavery.



A handwritten signature in black ink, appearing to read 'Royce Galea'.

Royce Galea
Chief Executive Officer and Managing
Director



A handwritten signature in black ink, appearing to read 'Darren Perry'.

Darren Perry
Chairman and Independent Non-Executive
Director

4. COMPANY OPERATIONS, STRUCTURE & SUPPLY CHAIN

Purpose

We are a trusted partner to businesses across Australia and New Zealand providing cleaning, security, and integrated property services, making places and spaces better for people.

Millennium Values

Service

We care about the needs and expectations of our clients and the community, and our people are driven to provide outstanding customer experiences.

Teamwork

We understand that working together, united as a team we are stronger, and the safety and wellbeing of our team is our top priority.

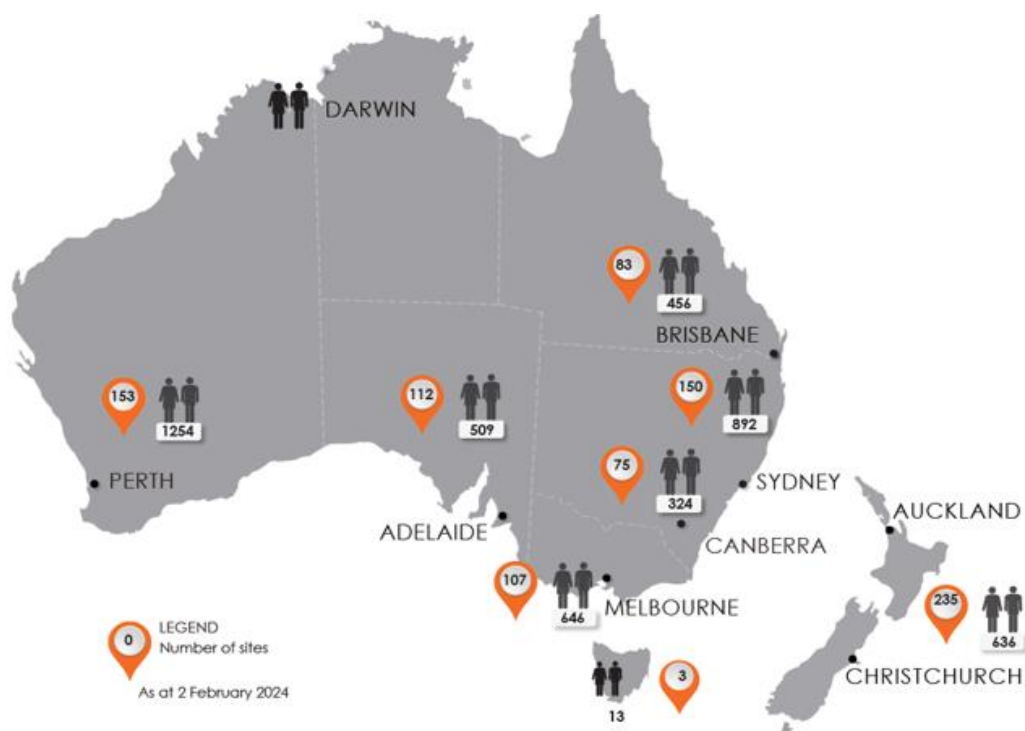
Integrity

We act ethically, maintain strong corporate governance, and are transparent and respectful to all our stakeholders.

Accountability

We take ownership for delivering results for our clients.

We provide the assurance and peace of mind of working with a company with a strong commitment to corporate compliance and an unwavering commitment to delivering tailored solutions and exceptional customer experiences for clients. We've been doing this successfully since 2003.



We serve clients across sectors including Retail, Commercial, Government, Hospitality, Industrial and Education. Our team provides property services at more than 800 client sites and clients choose integrated or independent services to suit their needs. We have offices in Melbourne, Sydney, Brisbane, Adelaide, Perth, Canberra, Auckland, and Christchurch.

Our services include:



Cleaning Services

- Retail properties
- Food Courts
- Rest rooms & Car Parks
- Commercial Buildings
- Schools & Universities
- Entertainment precincts
- Airports
- Distribution Centres
- Specialist Cleaning

Integrated Property Services

- Concierge
- Maintenance
- Hygiene services
- Waste Management
- Facility Support

Security Services

- Building Security
- Access Control
- Mobile Patrol
- Asset Surveillance
- Control Room monitoring
- Loss prevention
- Crowd control
- Event security

Since 2003 Millennium has been at the forefront of the cleaning industry as the leader in high volume traffic cleaning in large public spaces and retail centres and has a reputation for:

- Driving innovation
- The early testing of new technologies
- Adopting technologies and equipment that have proven to deliver significant efficiencies and savings
- Improving the safety of our workplaces and the wellbeing of our staff.

Cleaning Statistics

10,000,000	People transit the Centres we clean each week.
1,500,000	Sqm of mall space cleaned each week.
350,000	Carparks and Driveways cleaned weekly.

Security Daily Centre Statistics

1.1M	Sqm of mall spaces patrolled daily
1,250	Alarms monitored 24/7
3,750	Doors locked and checked per night.
52,500	Incident responses per annum
6.2M	Mall patrol rotations completed per annum



Our People

We are a people business. It is through and with our team that we deliver outstanding service to our customers and clients every day. Our people are our biggest investment and our most valuable asset



Millennium Management Cleaning & Security Staff

14	State Based Managers
32	Client Relationship Managers
93	State Based Functional Staff
4,500	Cleaners at more than 1080 sites
497	Security Officers at more than 100 sites



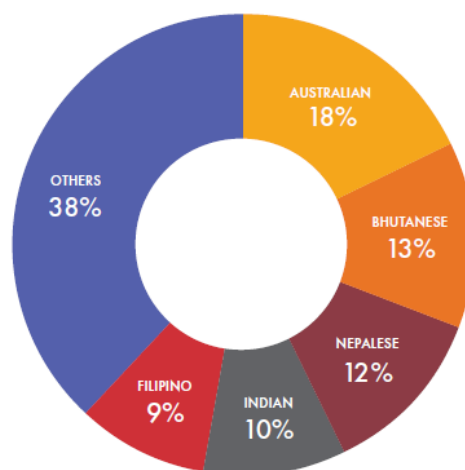
We recognise the benefits of having a truly diverse workforce. Our employees come from all backgrounds and proudly represent more than 40 different nationalities, cultures, and ethnicities.

Our passion is to create a culture that is diverse, inclusive and one that respects and celebrates differences.

The majority of our team categorised above as "others" is made up of approximately 100 distinct ethnicities. Some of the larger groups within Others include: Sri Lankan, Pakistani, Thai, Maori, Cook Island, Aboriginal & Torres Strait Islander, Colombian, Chinese and Bangladeshi. Our employee population is 54.4% male and 45.6% female.

At the management level, our composition is 61.9% male and 38.1% female. The Millennium Board has set targets to ensure we continually grow diversity across our salaried employees and in the leadership group.

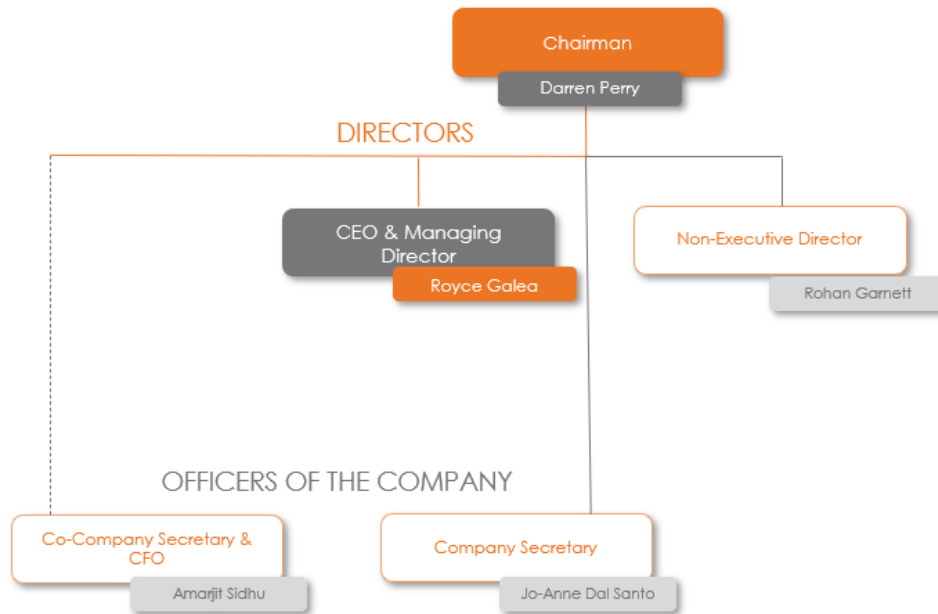
Ethnic Diversity (% of team members)



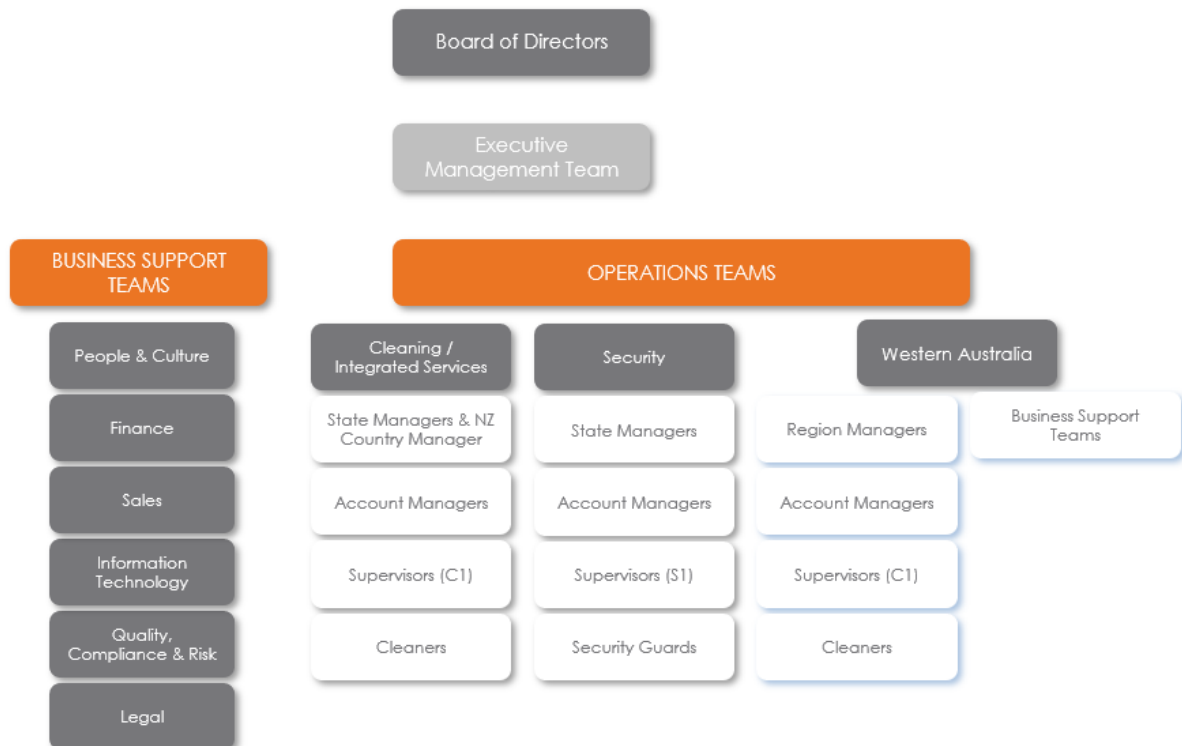
We proudly employ people from all kinds of backgrounds. This includes providing job opportunities for new immigrants, people returning to work from periods of unemployment, and First Nations people. We also provide opportunities for people with disabilities. We create and offer entry-level roles that accommodate the challenges they face in their daily lives. We are dedicated to ensuring we employ in accordance with Fair Work Australia Modern Awards and National Employment Standards.

Internal Structures

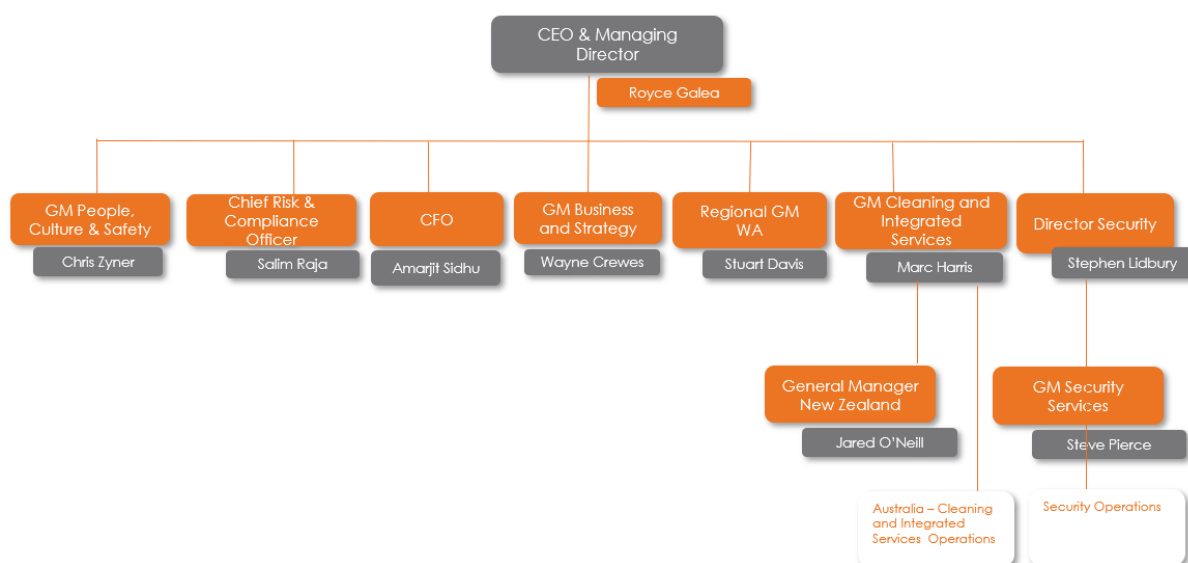
- Millennium Board Structure**



- Millennium– Operational & Functional Organisation Structure**



- **Millennium Executive Management Team – Modern Slavery Risk Committee**



- **Modern Slavery Risk Committee – Roles & Responsibilities**

While the People & Risk Committee is the Governing body for the development of the Modern Slavery prevention framework along with developing and overseeing the internal controls there are key roles defined for each level of management within Millennium which are outlined as below.

- **Executive Management Team**

The members of the Executive Management Team (EMT) will ensure that Millennium's Modern Slavery policies and procedures are always followed.

This includes, however is not exclusive to the identification and monitoring of risk in the supply chain and ensuring our suppliers abide by Millennium's Modern Slavery policies and procedures. In addition, they will ensure all supplier contracts contain provisions against Modern Slavery.

The EMT member will also ensure that all employees within their sphere of accountability are trained in Millennium's policies and procedures as they relate to Modern Slavery and adhere to the policies and procedures.

The EMT members will ensure compliance with the annual Modern Slavery Statement reporting requirements and will establish a supportive, safe culture that supports our employees in disclosing information about possible Modern Slavery risks in our business and supply chain.

- **Senior Management Team**

The Senior Management Team (SMT) members will also ensure that Millennium's Modern Slavery prevention policies and procedures are always followed.

The team members have established a supportive, safe culture that encourages our employees to disclose information about possible Modern Slavery risks in our business and supply chain.

They will communicate with all stakeholders throughout the supply chain to ensure everyone complies with the Modern Slavery Act requirements.

The SMT will conduct regular audits on our suppliers and sub-contractors to ensure that they comply with the Modern Slavery Act

○ **Account Management Team**

The Account Management Team (AMT) members will complete and remain up to date with the training requirements on Modern Slavery risks.

They will comply with the policies, procedures, and Code of Conduct in relation to Modern Slavery

They will also report any suspicions they may have about Modern Slavery risks within the business and supply chains.

Millennium Modern Slavery Risk Framework

• **Governance**

At the heart of Millennium's Modern Slavery Framework are its policies which are defined by the People & Risk Committee and endorsed by the Board. The Executive Management Team and the Modern Slavery Risk Committee are also responsible for the development, monitoring and review of the Employee Code of Conduct and the Supplier Code of Conduct as well.



Millennium Modern Slavery Framework Governance

In addition to the policies and the code of conduct the framework has four critical elements which support and aid Millennium and its team on delivering on the prevention of Modern Slavery risk commitment.

- **Regulatory Compliance:** Millennium holds labour hire licenses in Victoria for both Cleaning & Security services delivered to its clients. In addition, Millennium also holds a labor hire license in Queensland for delivering security services. In the Australian Capital Territory Millennium is also registered and maintains certification with the Secure Local Jobs Code for delivering cleaning services.
 - **Industry Specific Compliance:** Millennium delivers its cleaning and security services in an ethical and socially responsible manner which includes commitment to compliance codes and standards of independent bodies such as the CAF in the cleaning sector and ASIAL as the peak Industry body in the security sector.
 - **Third Party (Independent) Audits:** Millennium has an exhaustive third-party audit regime to demonstrate ethical and good wage compliance and workplace condition practices. This is verified through independent audits conducted by independent agencies such as Intertek, Workplace Wizard, Fair Supply, KPMG, E&Y, Quality Consulting Group and David Hicks & Associates to name a few. These audits vary in scope ranging from organization wide to client specific portfolios.
 - **Internal Controls:** Millennium constantly strives to improve its internal controls to improve the prevention, monitoring and reporting of any Modern Slavery risks within its internal operations and supply chain. Millennium has developed a tailored training program for its Management Teams to educate and create awareness in relation to Modern Slavery Risks and the tools available within Millennium to identify, report and remedy any issues. In addition Millennium has a Whistle Blower Program for confidential reporting of any Modern Slavery, bullying, harassment or discrimination issues which is directly overseen by the Head of People & Culture, the CEO and the Board.
- **Licences, Certifications and Memberships**



• Supply Chain

As part of Millennium's Approved Supplier Program, we engage suppliers who are shown to have strong governance frameworks and who adopt high ethical standards. Millennium's suppliers must at the minimum comply with the following requirements:

- Comply with all applicable laws and regulations including those relating to bribery, corruption and prohibited business practices.
- Conduct business in an ethical, equitable and professional manner.
- Ensure that their own supply chain and related third parties conduct their businesses in a fair, safe and ethical manner and complies with the Modern Slavery Act (2018).
- Ensure they meet their contractual obligations to us and their own suppliers.
- Disclose any actual or potential conflicts of interest that they or any related party may have in relation to the goods or services being supplied.
- Maintain a formal complaints management process for employees and members of the communities in which they operate or provide services.

In addition to the above, Millennium's Supplier Code of Conduct ensures that suppliers meet the requirements and code of conduct set out by Millennium in relation to each of the below categories:

- Anti Bribery & Corruption
- Privacy & Confidentiality
- Whistleblower Policy
- Risk Management
- Work Health & Safety
- Environmental Management
- Community standards
- Labor Policies, Human Rights & Non-Discrimination

A review of the Millennium Supply Chain which commenced late 2022 and ran through 2023 identified efficiencies and Millennium were able to rationalise and consolidate the supplier categories to better manage risk within the supply chain. Millennium were able to group suppliers in Approved & Preferred Supplier categories as below and on the basis of the classification of supplier triggered a customised level of due diligence process.

Type of Service Provided		Frequency of Engagement of Supplier	Type of Supplier
1	Goods or Consumables	One off / Ad-Hoc	Preferred
		Routine	Approved
2	Labor Hire Provider	One off / Ad-Hoc	Approved
		Routine	Approved
3	Onsite Services – Work Conducted on Millennium or Client site	One off / Ad-Hoc	Approved
		Routine	Approved
4	Offsite Services - Work not Conducted on Millennium or Client site	One off / Ad-Hoc	Preferred
		Routine	Approved

The below table provides details on the number of suppliers within each category.

Goods or Consumables	61	Labor Hire Provider	16
Onsite Services – Work Conducted on Millennium or Client site	54	Offsite Services - Work not Conducted on Millennium or Client site	103

A detailed breakdown of Millennium Supply Chain including the Supplier Categories and Procurement categories is found in the below tables.

Supplier Categories	
Goods or Consumables	Consumables, Uniforms, Cleaning Supplies,
Labor Hire Provider	Security Services, Cleaning Services
Onsite Services – Work Conducted on Millennium or Client site	Specialised cleaning Building contractors, Waste Management, Hygiene services, Equipment Hire, Equipment repair & maintenance, Pest Control Security Services
Offsite Services - Work not Conducted on Millennium or Client site	Insurances, IT/Telecommunication, Laundry, Equipment Repair, HR & Recruitment, Consultancy, Medical services

For each of the supplier categories the good/services procured at Millennium is grouped into Procurement Categories as outlined below:

Procurement Categories	
Cleaning Products	Commercial cleaning consumables and supplies
Information Technology	Hardware, software, cloud services, IT consultancy services
Corporate Services	Consultancies, Insurances, Accounting, Property Lease
Security services	Licensed Security providers for major events
Plant & Equipment	Vehicles, Commercial cleaning equipment
Apparel	Uniform, Footwear, Weatherproof clothing
Safety Equipment	PPE, First Aid & Spill kits

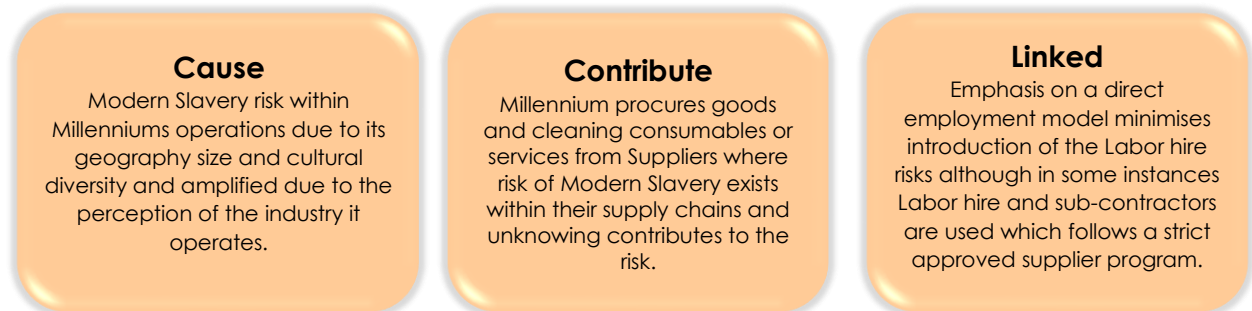


5. RISK ASSESSMENT

Millennium approach to Modern Slavery Risk

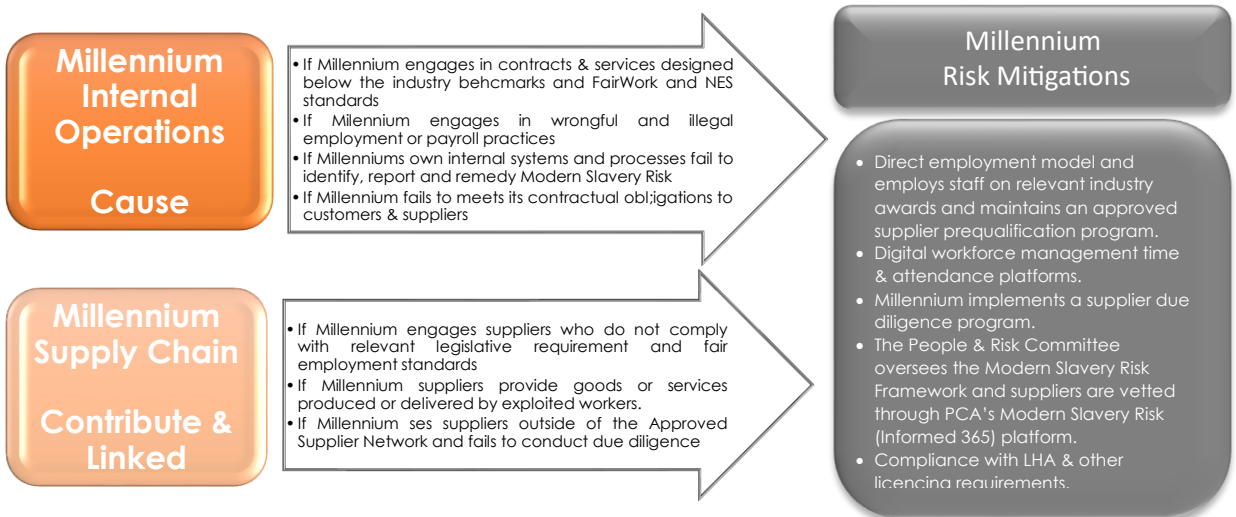
As previously outlined in our Third Modern Slavery Statement, Millennium assesses its Modern Slavery Risk in line with the United Nations Guiding Principles through the following scenarios of Cause, Contribute and Linkages. Building on these principles Millennium has assessed its impact as outlined below.

According to the United Nations Guiding Principles on Modern Slavery an organisation can have Human Rights impact through the following:



Millennium adopts the UNGP continuum of Risk Management for the prevention of Modern Slavery Risk.

Risk Scenarios



Property Council of Australia - Millennium Services Group Assessment

Initial analysis sourced from the Property Council of Australia Platform (Informed 365) is a key resource for analysing risk. Millennium Services Group completes an annual self-assessment and has been completing same since 2019 when Millennium first joined the platform. According to the assessment form completed for **2023 - 2024**

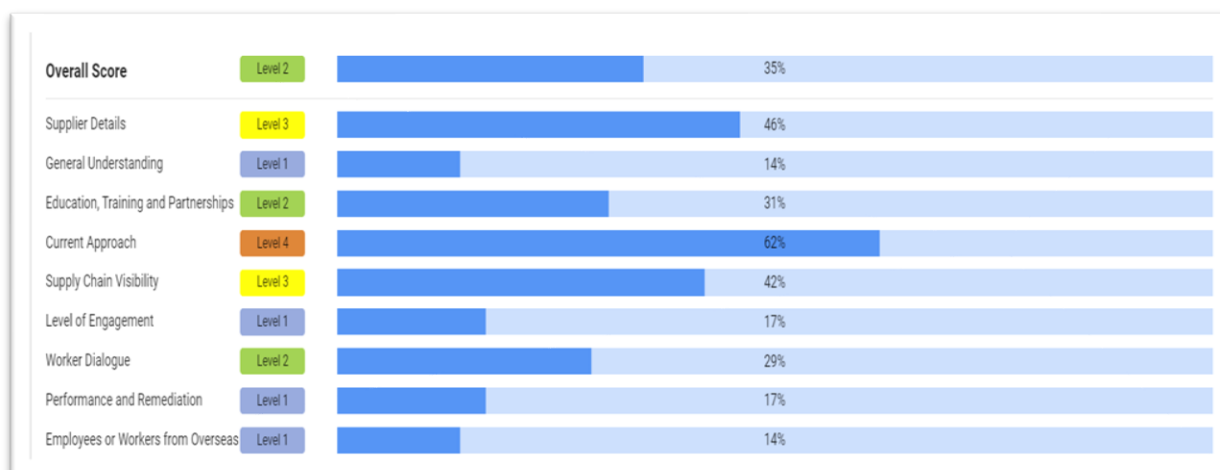
Millennium Services Group has been assessed as a **Level 2 – Low Risk Supplier** which is a further reduction from last year of a Level 3 – Medium Risk.

The **Risk Matrix** applied by the PCA is as below:

Risk Level	Percentage	Classification
Level 1	0-20%	Very Low
Level 2	21-40%	Low
Level 3	41-60%	Medium
Level 4	61-80%	High
Level 5	80-100%	Very High

The Modern Slavery risk self-assessment is based on 9 individual criteria including but not limited to supplier details and engagement practices to governance education & training and process for mitigating and remedying modern slavery risk when identified.

Modern Slavery Risk Self-Assessment – 2023 – 2024 Scorecard



Based on the assessment, the highest level of Modern Slavery risk identified within Millennium's Operation and Supply Chain is attributed to: Current Approach. The risk with the current approach is at a Level 4 – High Risk attributed to potential risks within the Tier 2 and beyond of the Millenniums Supply Chain.

Millennium also recognises that the Cleaning and Security service industries remain susceptible to Modern Slavery risks due to the nature of the industries themselves and, as a result the inherent risk of Modern Slavery risk has been focussed through the last year on delivering awareness and training sessions for our employees which has resulted in a reduction in the Education, Training and Partnership risk from a Level 4 – High Risk to a Level 2 – Low Risk.

Millennium's governance practices and controls in relation to Modern Slavery risk through the overall management of the Modern Slavery Risk Framework through Millennium's Board of Directors, People & Risk Committee and Executive & Senior Management members is always evolving which is demonstrated through Millennium's performance.

6. RISK MITIGATION & ACTIONS

Modern Slavery Training Content

Modern Slavery is an issue that can affect everyone including us at Millennium Services. It can affect consumers, who unknowingly purchase goods or services that are a product of Modern Slavery, through to the supply chains from which these goods or services are manufactured and distributed. Millennium recognises that human rights concerns can arise not only in our own operations, but also from interactions with external parties – who we have relationships with, customer interactions, supply chain management and the communities we serve.

In order to improve awareness Millennium has developed a tailored course which outlines what Modern Slavery is and what is expected of the Management Teams at Millennium to help eradicate this practice. The course also explains the responsibilities of Millennium to ensure that we comply with the Modern Slavery legislation. The course was developed in late 2022 and rolled out during 2023 to all Executive, Senior and Account Management Team members including Support services staff who directly or indirectly have the potential to “Cause”, “Contribute” or “Be Linked”, with Modern Slavery risks. The course content includes information as noted below.

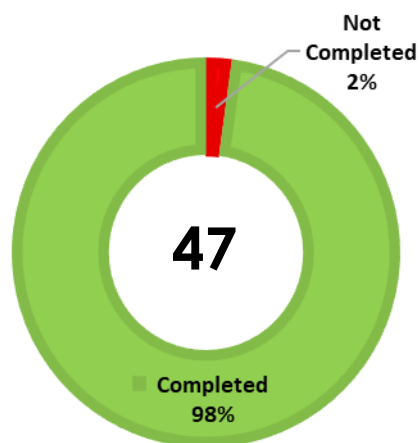
Millennium Modern Slavery Risk Course Outline

- What is Modern Slavery
- Millenniums Modern Slavery Context
- Types of Modern Slavery
- Millenniums Modern Slavery Policy Framework
- Modern Slavery Act 2018
- Modern Slavery Statement Requirements
- Millennium Modern Slavery Statement Details
- Reporting Entities
- Organisation Structure, Operations, Supply Chain
- Risks of Modern Slavery to Millennium
- Managing modern slavery risk in our supply chain
- Managing modern slavery risk in our operations
- Reviewing Internal Controls
- Consulting with Millennium stakeholders
- Millennium business responsibilities
- Millennium employee responsibilities

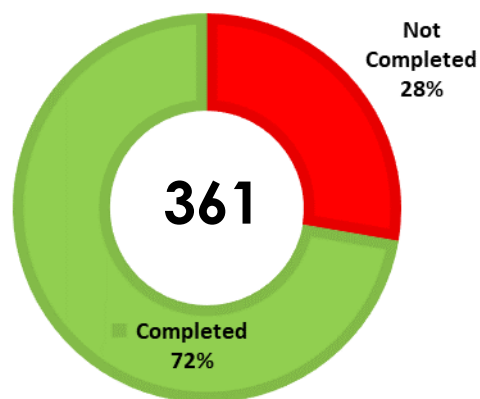


- **Training Statistics**

The Modern Slavery training course was delivered in two tranches. Tranche 1 included the Executive Leadership Team and Senior Management team members of the Millennium Team. This group completed the training during Q1 of 2023. Tranche 2 focussed on the Account Management Team and the Support staff who have people management responsibilities and the ability to impact Millennium's internal operations or supply chain. Tranche 2 was commenced during Q3 and Q4 of 2024.















Tranche 1
Executive & Senior Leadership
Team Members



Tranche 2
Account Management &
Support Staff

Health & Wellbeing Calendar - 2023

The Millennium HSE & Wellbeing Team has developed a calendar as shown below is designed to provide information on the Monthly Safety toolbox / alerts along with strategies to support good health and wellbeing for our employees. With the below, we want to support our employees by making simple, relevant information easily accessible and building healthy workplaces.

Wellbeing & HSE Toolbox Calendar 2023						
JANUARY	New Year, New Me 	Healthy Eating on the Go 	Recharge your Batteries 	Winter Wellness 	Heart Health 	Take a Break from the Daily Grind 
	Safety Alert: <ul style="list-style-type: none"> • Summer Hydration & Heat • Floodwater 	Safety Alert: <ul style="list-style-type: none"> • Importance of Mental Health in the Workplace 	Safety Alert: <ul style="list-style-type: none"> • Stopping Unsafe Work 	Safety Alert: <ul style="list-style-type: none"> • Winter Wellness / Hazards 	Safety Alert: <ul style="list-style-type: none"> • Importance of PPE 	Safety Alert: <ul style="list-style-type: none"> • Situational Awareness
	New Year's Day (1st)	Smart Eating Week (AU/NZ)	World Sleep Day (17th) (AU/NZ)	World Health Day (7th) (AU/NZ)	Heart Week (AU/NZ)	Men's Health Week (AU/NZ)
HSE Toolbox: <ul style="list-style-type: none"> • Not Available(N/A) 						
JULY	Diabetes Awareness 	Live Well, Age Well 	R U Ok? Day 	Health and Safety Month 	Men's and Women's Health 	End of year vibes 
	Safety Alert: <ul style="list-style-type: none"> • Electrical Safety 	Safety Alert: <ul style="list-style-type: none"> • Chemical Safety & Spill Response 	Safety Alert: <ul style="list-style-type: none"> • Maintaining a Healthy Mind 	Safety Alert: <ul style="list-style-type: none"> • Working at Height 	Safety Alert: <ul style="list-style-type: none"> • Safe Use of Ride on Equipment 	Safety Alert: <ul style="list-style-type: none"> • Safe Driving
	National Diabetes Week (AU/NZ)	National Stroke Week (8th -14th) (AU/NZ)	RU OK? Day (8th) (AU/NZ)	Mental Health Awareness Month (AU/NZ)	National Skin Cancer Action Week (AU/NZ)	Christmas (25th) New Year's Day (31st)
HSE Toolbox: <ul style="list-style-type: none"> • Manual Handling 						
HSE Toolbox: <ul style="list-style-type: none"> • Handling Sharps & Bodily Fluids 						
HSE Toolbox: <ul style="list-style-type: none"> • Fire Safety 						
HSE Toolbox: <ul style="list-style-type: none"> • Ladder Safety 						
HSE Toolbox: <ul style="list-style-type: none"> • Dealing with Violence & Aggression 						
HSE Toolbox: <ul style="list-style-type: none"> • Not Available(N/A) 						

Acknowledging the Cleaning & Security Services Teams at Millennium – 2023

- **Thank You Cleaner Day**

Cleaners provide an essential service, yet most of the people undertaking this important work are invisible to us. Every day, more than 4,700 skilled, hard-working cleaning staff are onsite at our client's premises ensuring that facilities are clean and safe for the community to enjoy. Whether it is a Commercial, Retail, Industrial, Aged Care or Recreational facility, cleaners work, day, night, and weekends to keep places and spaces clean, safe and hygienic, often outside of normal working hours.

Thank Your Cleaner Day has recently gained significant momentum across the world and has been recognised at the World Federation Building Services Congress (WFBSC) in Berlin.

Thank Your Cleaner Day recognises the hard work cleaners do and lets them know they are valued and appreciated. On 18th October 2023 Millennium celebrated Thank Your Cleaners Day with its cleaning workforce across multiple client sites. Pictures of the events are included below.



The Millennium Management Team in NZ also shared a video message to employees as part of the Thank Your Cleaner Day celebrations. A link to the video message is available as below:

Video Link: <https://www.linkedin.com/feed/update/urn:li:activity:7120166871282176000>

- **International Security Officers Day**

Every day, 400+ Millennium security officers work to protect the public and assets and infrastructure. International Security Officers' Day, which takes place on the 24th of July every year, is an opportunity to recognise and thank those people who work behind the scenes to keep us safe each and every day.

The significance of the day on the 24th day of July is to recognise the 24/7 nature of security work undertaken by the Security Officers'. Millennium celebrates International Security Officers' Day each year and in 2023 a thank you video was produced. A link to the video is included below.

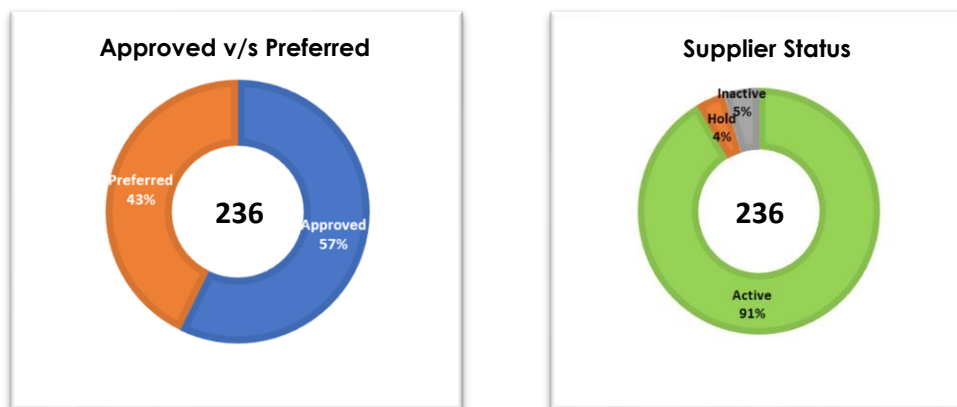


Video Link: [International Security Officers' Day 2023 – YouTube](#)

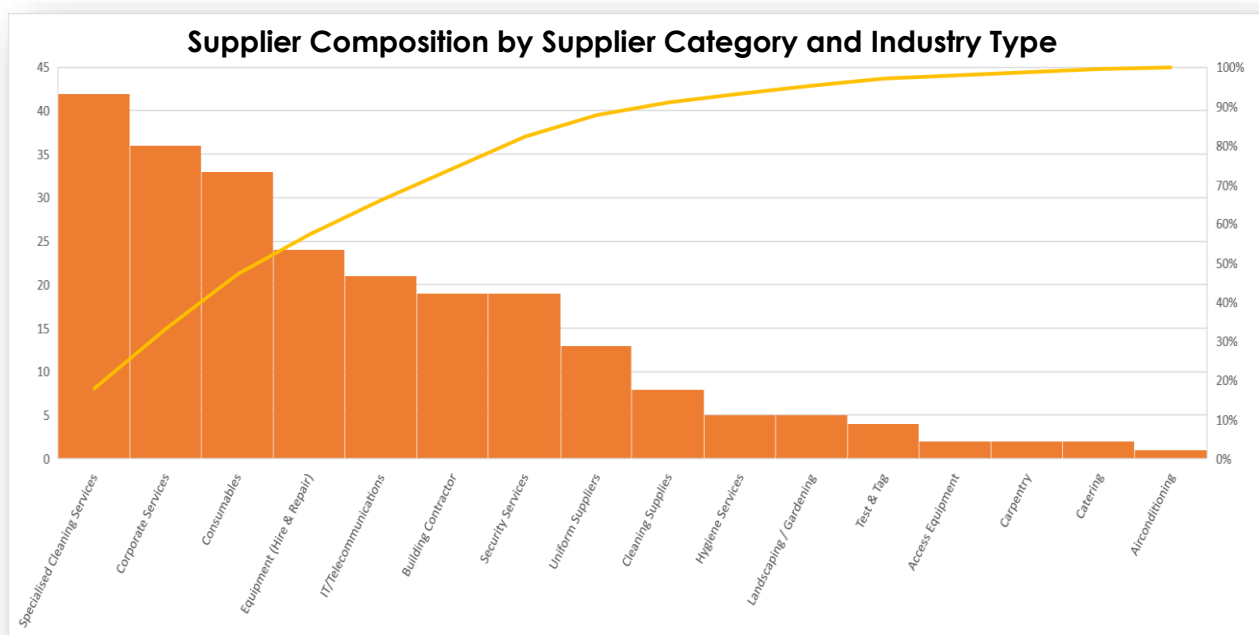


Supplier Analysis

Through this review of the total 525 suppliers within the Millennium supplier's database, Millennium has identified 236 active suppliers as providing some form of Goods or Consumables, Labor hire or Services to Millennium during this reporting period. Of the total suppliers, 135 suppliers are considered approved suppliers and 101 are considered as preferred suppliers. At the time of compiling the report The Compliance team have placed 9 suppliers on hold for not meeting Millennium's Supplier Code of Conduct and associated requirements and are working with these identified suppliers to ensure they comply with the requirements or are removed from the approved supplier program. An additional 11 suppliers have also been identified as inactive who haven't been engaged by Millennium during the last reporting period.



The goods and services procured from the various suppliers can be grouped into the following Industry Types as shown in the Pareto Analysis below.



In addition to the analysis by supplier spend Millennium also enrolled its suppliers onto the Property Council of Australia – Informed 365 platform and encouraged suppliers to complete the Modern Slavery Risk Assessments Questionnaire and, based on the responses provided by the Suppliers, the following categories have been identified as requiring further attention to prevent the risk of Modern Slavery.

Modern Slavery Risk Criteria requiring attention	Risk Rating
Current approach to modern slavery risk and reporting obligations including education and training of employees on modern slavery risk	High
Workers Dialogue to raise concerns in relation to Modern Slavery Risk	High
Evaluation of performance and remediation of Modern Slavery Risk	High
Suppliers' own policies and procedures to tackle Modern Slavery Risk	High

The insights gained from the data received to date on the Property Council of Australia Informed 365 platform have further allowed Millennium to review and enhance our framework to mitigate suppliers' modern slavery risk in our supply chain against the following key risk aspects.

- Geography of Suppliers
- Industry / Service Type
- Awareness of Modern Slavery risks

Geography of Suppliers	
Risk Criteria	Risk Rating
Tier 1 Suppliers – 100% of suppliers are based in low-risk countries	Low
Tier 2 & 3 Suppliers – Approximately 50% of the supply chain includes Tier 2 & Tier 3 Suppliers	Medium
Action & Control	
As part of our continuous improvement program, Millennium undertook a procurement consolidation project in FY23 resulting in a 50% supplier reduction.	

Industry / Service Type	
Risk Criteria	Risk Rating
Labor Hire / Onsite Service Providers - All are based and located in Australia or New Zealand and are predominantly used for events management or roster gap coverage. The modern slavery risks associated with these activities are recognised to be increased given third-party involvement	Medium
Apparel Uniform Supplier - The apparel industry is ranked # 3 by Global Slavery Index and while Millennium Tier 1 supplier is based in Australia further verification and validation of the Tier 2 supplier is required	High
Action & Control	
Millennium engage the services of registered providers who comply with company and individual state licensing requirements. Millennium is investigating introducing a supplier diligence program beyond Tier 1 suppliers.	

Modern Slavery Awareness	
Risk Criteria	Risk Rating
Approximately 40% of the approved suppliers have yet to commit to assessing their own Supply Chain Modern Slavery risks	Medium
Action & Control	
Communication and training from Millennium and Informed 365 will continue, to drive this number lower and improve quality and depth of risk assessment throughout our supply chain	

7. ACTIONS EFFECTIVNESS

Independent Wage Compliance Audits

In late 2022 Millennium engaged Intertek Assurance Solutions to undertake a Wage Pay-check Assessment across its major retail client portfolio for both cleaning and security services. The assessment project timeline concluded in Q1 – 2023 with Intertek providing its findings to the business and Executive Team.

The scope of the audit included:

1. Employment Contracts
 - a. Signed Employment Agreement
 - b. Employee Collective Agreement
 - c. Valid Working Visa
2. Working Hours
 - a. Excessive Working Hours
 - b. Working Hours in line with Visa requirements
3. Wages and Benefits
 - a. Timesheets and Payslip Comparison
 - b. Remuneration and entitlements
 - c. Review of Remittance Advice
 - d. Superannuation Contributions
 - e. Leave Entitlements
4. Management System
 - a. Evidence of GST registration
 - b. Up-to-date workers compensation Insurance
 - c. Long Service Payment Scheme registration



An extract of the Executive Summary Report noting the auditors' findings from this audit is included below.

It was identified within the report that for a short period and against a limited group, overpayment of superannuation did occur. The overpayments are due to Superannuation being paid against the full payment received, including overtime and allowances. However, under the rules of Super, only base rates and allowances should have been included, and some allowances are exempt. In discussions with Millennium this has been identified and remedied in latter pay periods.

The document reviewed did not show any gross underpayments for staff. All staff were paid at or better than the award. Variations in the payments were due to early rounding by the Award vs a calculation of the award loading and penalty rates being rounded at the end. In most cases, the value was low and is reflected in the report data. This data will be made available to Intertek for record keeping.

Wage Paycheck Assessment Summary Report

Document # F103-20-Paycheck

Release Date: 01-03-2023

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The Intertek "Wages" Pay-Check assessment provided Millennium and its clients with assurance that workers within the organisation and its supply chain are being paid in accordance with their respective Award.

Third Party Client Audits

• Stockland Ethical Sourcing Assessment



In early 2023 Stockland along with Ernst & Young engaged with Millennium Services Group for an Ethical Sourcing Assessment in relation to the Cleaning & Security services provided by Millennium across the Stockland portfolio. The objective of this supplier assessment was to further investigate the responses provided by Millennium from the submitted Self-Assessment Questionnaire. Specifically, Stockland and EY undertook a deep dive into the queries identified through the analysis of Millennium responses to the questionnaire. This assessment therefore provides an opportunity for Millennium to provide further context and detail on the responses and enable Stockland and EY's Modern Slavery committee to assess the evidence supporting the questionnaire responses.

Scope of the Audit:	Cleaning & Security Services including Supply Chain (All of Stockland Portfolio)
Audit Locations:	Millennium Head Office (Victoria)
Site Locations:	Victoria, Queensland, New South Wales, Western Australia
Employee Count:	250 Front Line & Supervisory staff

Objective	Audit Criteria	Performance
Organisational Governance & Performance	• Compliance obligations are met with respect to employment law (Fair Work Act, Awards, and other relevant legislation (e.g. Workplace Health & Safety, Equal Employment Opportunity	Compliant
	• Oversight of organisational activities, including employee actions	Compliant
	• Management responses to issues raised	Compliant
	• Organisation's approach to safeguarding personal data, document retention and cyber risk management	OFI
HR and Recruitment activities	• Workforce profile, including approach to contracting (use of casual and part-time labour) and sub-contracting	OFI
	• Remuneration and other entitlements (salary, wages, superannuation, etc.)	Compliant
	• Employee recruitment processes, e.g. use of agencies, applicant screening and checks (e.g. visas), selection process, on-boarding, and training	Compliant
	• Working hours and ongoing employee management, e.g. work allocation, rostering and shift selection, performance management, etc.	OFI
	• Issues and conflict management, e.g. harassment and bullying complaints	Compliant
	• Union membership	Compliant
	• Employee diversity and equal opportunity (e.g. gender, age, cultural background, etc.)	Compliant
	• Grievance mechanisms, e.g. Whistleblowing, Employee Assistance Program	Compliant
Procurement and supply chain practices	• Procurement activities, including nature of purchased goods and services	Compliant
	• Tendering processes and supplier screening	Compliant
	• Monitoring and contract management of contracted suppliers	OFI
Workplace Health & Safety	• Processes for managing legislative compliance (e.g. Work Health Safety Act (2011))	Compliant
	• Processes for ensuring appropriate insurances are maintained (including Workers	Compliant
	• Compensation and public liability insurance)	Compliant
	• Policies, procedures, and controls that address health, safety, and wellbeing risks, e.g.	Compliant
	• Reporting and investigation of incidents (including near misses), training provided, PPE	Compliant
	• Supplied, approach to third-party incidents (sub-contractors, shoppers/residents)	OFI

*OFI – Opportunity for Improvement

Millennium Service Group ABN: 11 607 926 787

• Scentre Group Wage Compliance Review



In early 2023 Scentre Group engaged David Hicks & Associates to undertake a Wage Compliance Audit of Millennium Services direct employees and suppliers across the Cleaning & Security portfolio at three of its sample sites in New South Wales. The audit covered approximately 200 front line and supervisory Cleaning & Security staff. The audit also covered sub-contracted activity which included specialist cleaning services and ad-hoc surge activity during the busy Christmas retail period.

The audit scope and performance is as outlined below.

Audit Criteria	Performance
List of Employee Register/Subcontractor Register	Compliant
Industrial Instrument and/or Enterprise Agreement employees are retained under	Compliant
Workers Compensation documentation for employer entities	Compliant
Copies of Contracts with all employees	Compliant
Copies of Contracts with all sub-contractor employees	OFI
Detailed payroll reports for the employees for selected periods	Compliant
Payslips for all employees associated with selected periods	Compliant
Payslips for all sub-contractors associated with selected periods	OFI
Rosters and timesheets for all hours worked	Compliant
Evidence of wage transfer for all employees	Compliant
Evidence of wage transfer for sub-contractors	OFI
Invoice reconciliation from sub-contractors	Compliant

*OFI – Opportunity for Improvement

• Lendlease Workplace Condition Assessment



In the middle of 2023 Lendlease engaged Intertek to undertake a Workplace Conditions Assessment Audit with a Human Rights focus of the Management Systems and the working conditions of the employees working at the Lakeside Joondalup Shopping Centre in Western Australia. The audit scope was for the Cleaning & Maintenance services provided onsite. Millennium employs approximately 90 frontline and supervisory positions on this site. The audit scope and performance following the audit are as outlined below.

Objective	Audit Criteria	Performance
Policy Review	<ul style="list-style-type: none"> Human Rights Policies, Modern Slavery – Forced Labour, Child Labour, Antidiscrimination, Harassment and Abuse, Disciplinary, Grievance etc. Recruitment, Working hours policies, CBA, Code of Conduct, Employee Manuals 	Compliant
Disciplinary Record Review	<ul style="list-style-type: none"> Resignation / Termination Records Review Employment Contracts Training Records Grievance Records 	Compliant
Rostering	<ul style="list-style-type: none"> Rostering processes 	OFI
Employee Interviews	<ul style="list-style-type: none"> Discussions with employee regarding policies and procedure understanding 	OFI
Social Compliance Management System	<ul style="list-style-type: none"> Internal Audit, Management Review, Supplier / Subcontractor Control 	Compliant
Payroll	<ul style="list-style-type: none"> Payroll, working hours, Superannuation leave etc records review – Records for last pay run and 2 randomly selected pay periods 	Compliant

*OFI – Opportunity for Improvement

• Vicinity Compliance Audits – Workplace Wizard



In late 2023 Vicinity engaged Workplace Wizards to conduct compliance audits specific to prevention of Modern Slavery for the Cleaning & Security services provided by Millennium across the Vicinity Centres in Victoria, Queensland, and Western Australia. The audit revealed low level opportunities for improvements and yielded a very positive result.

Cleaning Accountability Framework - Building Certifications

Millennium has been committed to supporting its clients with the Building Certifications to the CAF 3 Star standard. The standard covers 6 essential criteria as outlined below.

1. CAF Standard 1 – Fair Labor Practices
2. CAF Standard 2 – Responsible Contracting & Transparency
3. CAF Standard 3 – Safe Working Conditions
4. CAF Standard 4 – Financial Viability
5. CAF Standard 5 – Worker Engagement
6. CAF Standard 6 – Issue Identification and Remediation



During the calendar year 2023, Millennium committed to participating in several Building Certifications across its client portfolio across Australia and a brief summary of the site summary and certification are included below.

Property: 4 and 6 National Circuit
Location: Canberra (Australian Capital Territory)

Property Owner: ISPT
Property Manager: Knight Frank
No of Cleaners: Fourteen
CAF Certification Date: 11th December 2023

About the Property: 4 and 6 National Circuit are A Grade, state-of-the-art office buildings in the Barton precinct of Canberra. Developed by ISPT in 2012, the buildings are the heart of ISPT's National Circuit precinct.



Property: St Clair Shopping Centre
Location: Adelaide (South Australia)

Property Owner: ISPT
Property Manager: JLL
No of Cleaners: Nine
CAF Certification Date: 25th January 2024

About the Property: St. Clair Village, owned by ISPT, caters to customers everyday shopping needs with 16 specialty stores anchored by a Coles supermarket. Conveniently located adjacent to the St. Clair housing estate on the former Cheltenham Racecourse on Cheltenham Parade, St. Clair



Property Name: 206 Bourke Street
Location: Melbourne (Victoria)

Property Owner: ISPT
Property Manager: JLL
No of Cleaners: Four
CAF Certification Date: 18th December 2023



About the Property: Owned by ISPT, 206 Bourke Street is in the heart of Melbourne's Chinatown with an exciting fusion of food, entertainment & retail. A vibrant, lively gateway between broader Melbourne and Chinatown, 206 Bourke Street's offering is like nowhere else, catering for all budgets and tastes.

Property Name: Bracken Ridge
Location: Brisbane (Queensland)

Property Owner: ISPT
Property Manager: JLL
No of Cleaners: Four
CAF Certification Date: 5th February 2024



About the Property: Bracken Ridge Plaza, owned by ISPT, is located approximately 18 km's north of the Brisbane CBD. The Centre is anchored by a Coles supermarket and 24 specialty stores.

Property Name: Eastgate Shopping Centre
Location: Sydney (New South Wales)

Property Owner: ISPT
Property Manager: JLL
No of Cleaners: Seven
CAF Certification Date: 4th December 2023



About the Property: Eastgate Bondi Junction, owned by ISPT, is a well-established sub-regional Shopping Centre located in the heart of Bondi Junction, Sydney. Eastgate offers four levels of retail conveniently adjoined to a 930-space car park providing access on each level of retail.

Ecovadis Assessment

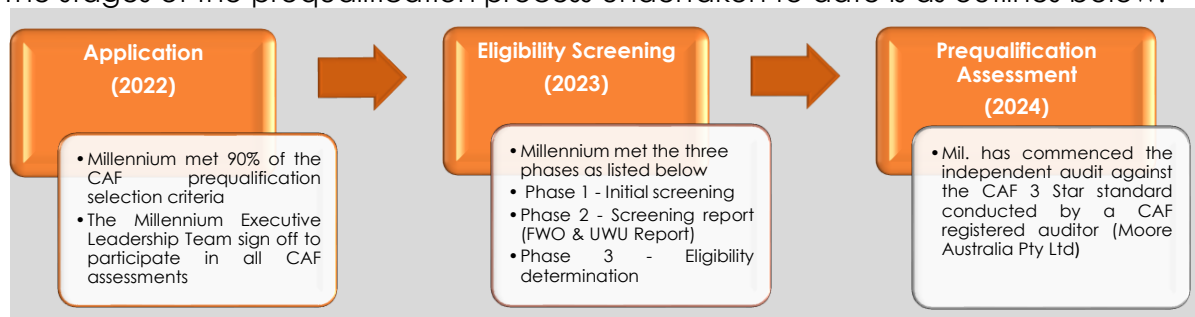
Millennium undertook the yearly Environment, Social & Governance (ESG) audit via the Ecovadis platform and achieved a score of 54 / 100 placing it in the Top 60th percentile of all companies participating on the platform audit. Millenniums performance and a comparative score is as shown below.



CAF Organisation Prequalification

The CAF contractor prequalification verifies that cleaning contractors' HR systems, policies and procedures are set up to promote compliance with the CAF 3-star standard. The CAF Building Certification and CAF Prequalification are designed to complement each other. Millennium Services Group has initiated the prequalification process and has currently progressed to the third and final stage of the prequalification process which is the Prequalification Assessment conducted by Independent Third-Party Auditors.

The stages of the prequalification process undertaken to date is as outlines below:



Summary of Compliance Status

For the purposes of the Stage 3 – Prequalification assessment a checklist was utilised and completed for each requirement under CAF's Prequalification Criteria to assess Millennium Services Group level of compliance. Details of the checklist, and the auditor's report have been shared with Millennium Directors and Executive Management. A **78.18%** compliance level was achieved with 5 identified and planned improvement opportunities. Millennium Services Group status of compliance with the CAF direction requirements is summarised below.

Status of Compliance	No	%
Compliant	40	72.73%
Improvement Opportunities	3	5.45%
Compliance Deficiency	12	21.82%
Not Applicable	10	-

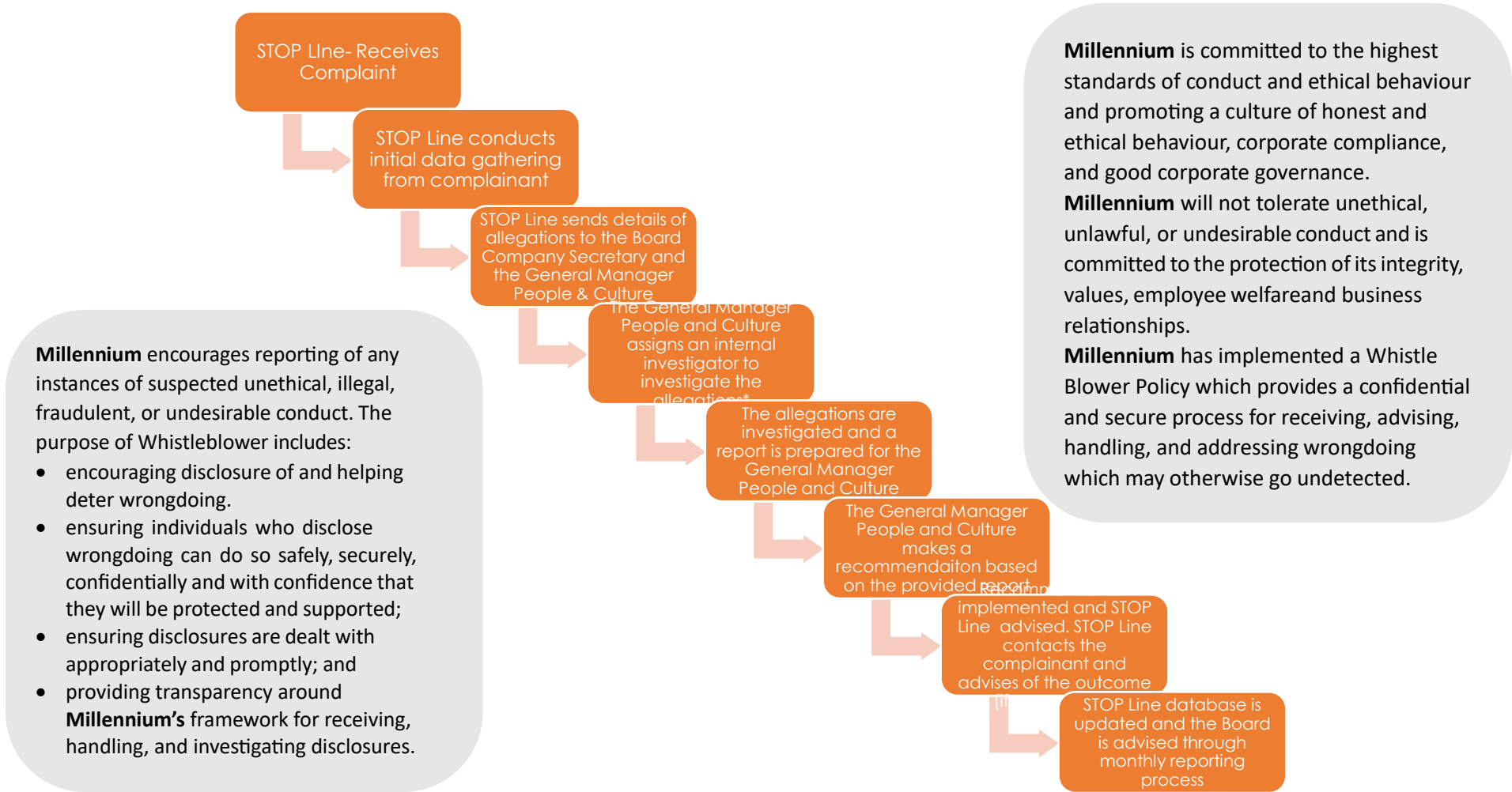
CAF AUDIT REPORT



8. MILLENNIUM WHISTLEBLOWER PROGRAM



STOP Line Process



9. PEOPLE MANAGEMENT FOCUS

Message from Millennium's Chief People Officer

“2023 was a year of Policy and Procedure updates and of building our Frontline Leader capability in ‘Management 101.’”

Key Highlights 2023:

- Updated and reset our people management policies, practices, and procedures.
- Continued to enhance our internal reporting – People Matters, Exit Interviews
- Educated our Frontline Leaders on our new and updated people processes.
- Focused on our employee communication and engagement.

Key People Policy Update

We updated our Key People Policies to ensure:

- compliance with emerging Fair Work
- Commission/Ombudsman requirements
- contemporary good leadership and management practice

The key Policies that were updated were.

- ✓ Employee Code of Conduct
- ✓ Diversity and Inclusion Policy
- ✓ Bullying and Sexual Harassment Policy
- ✓ Equal Employment Opportunity Policy
- ✓ Family and Domestic Violence Policy
- ✓ Drug and alcohol policy

Performance & Misconduct Process

A new Performance and Misconduct Policy & procedures developed to include.

- Templates for our Frontline Leaders to use.
- Process Flows to ensure our Frontline Leaders understood the key steps to follow.
- Clarified roles and responsibilities of Frontline Leaders for managing employee performance and behaviour.
- Trained (face to face) our Frontline Leaders on the updated Policy, Process, Templates, process flows and roles and responsibilities.
- Regularly report to Senior Management, Board, and Operational Leaders on our Employee and Industrial Relations matters
 - ✓ the number per month closed out
 - ✓ Underlying reason (e.g. poor performance, abandonment of employment ...)

Exit Interviews

- We commenced conducting Exit Interviews mid 2023 with all employees.
- An on-line questionnaire is sent to all employees who exit Millennium.
- Employees are also provided the opportunity to have a conversation with a Human Resources team member should they wish.
- Exit Interviews are confidential and collated monthly.
- Results are shared with Senior Managers and millenniums Board Members

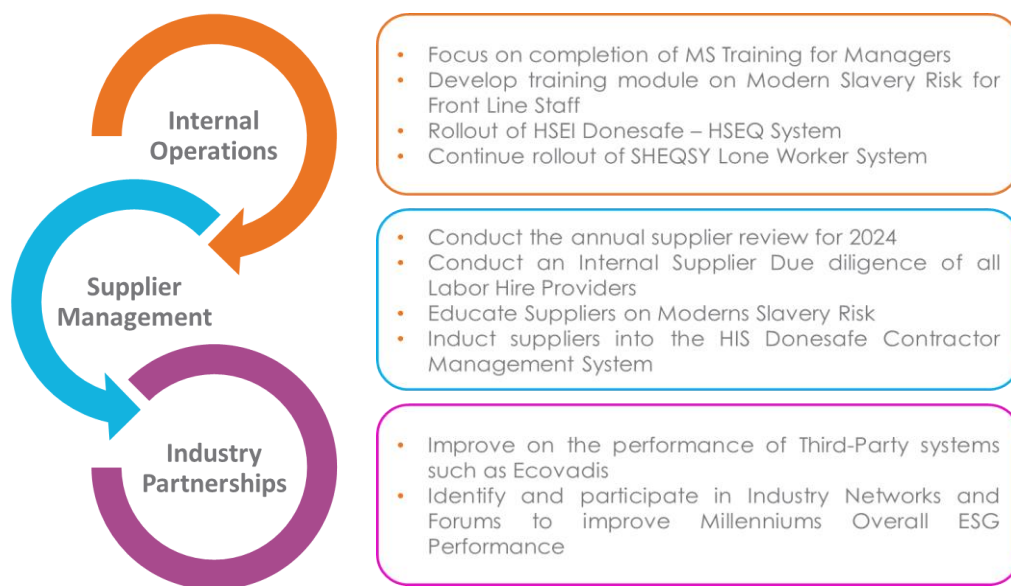
Whistle-blower Policy

- We use **StopLine**, an independent confidential provider of Whistleblower Services
- Whistleblower complaints are automatically sent to GM – P&C for investigation and to the Board for good governance.
- Updates, provided to the Board's People and Risk Committee on all Whistleblower complaints raised.
- Toolbox Talks during the year to re-educate and publicise the Whistleblower Policy,
- We received **One** formal complaint through **StopLine** during the year.

10. LOOKING FORWARD

Modern Slavery Risk – 2024 Roadmap

To ensure the continual operationalization and strengthening of the Modern Slavery Framework across Millennium's Internal Operations and Supply Chains the Board and Executive Management Team commits to developing strategies and focus in the following three areas.



Grievance and People Management – 2024 Roadmap

In order to enhance the opportunities for identification and reporting of potential Modern Slavery issues Millennium will focus on the four areas of Grievance and Performance management as outlined below.



REGISTERED HEAD OFFICE ADDRESS

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FOR FURTHER INFORMATION

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