



# **MODERN SLAVERY STATEMENT 2022**

**COMMERCIAL IN CONFIDENCE**

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# 1. Modern Slavery Statement for 2022

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This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) (the Act) by Secom Australia Pty Ltd (ABN 91 050 293 420), Secom Technical Services Pty Ltd (ABN: 97 319 699 425) and Asset Security Concepts Pty Ltd (ABN 70 113 813 595), collectively Secom. This Statement relates to the financial year ended 31 December 2022.

## 1.1. This Modern Slavery Statement

Secom does not tolerate modern slavery within its business and supply chains. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective and reasonable systems and controls in place to reduce the risks of Modern Slavery, and to best ensure that Modern Slavery is not taking place within our business or our supply chains.

This document explains the steps Secom has taken to prevent, detect and respond to slavery and human trafficking within our business and throughout our supply chains.

## 1.2. About our business

The principal activities of Secom are the installation, maintenance and sale of security systems, manpower guard services and security monitoring through Secom Australia Pty Ltd (ABN 91 050 293 420), Secom Technical Services Pty Ltd (ABN: 97 319 699 425) and Asset Security Concepts Pty Ltd (ABN 70 113 813 595)

Secom employs a skilled workforce of over 400 across Australia and New Zealand. Most of our workforce consists of full-time employees with a percentage of sub-contracted workers.

## 1.3. Supply Chain

Our relationships with suppliers are often long-term due to the length of our contracts and project lifecycles and so we aim to work with suppliers who embrace standards of ethical behavior consistent with our own. During the financial year, Secom spent over \$64million with directly contracted suppliers. We purchase a wide range of service and products from our supplier base.

Services and Products are either integrated into the products and solutions to Secom's customers (direct purchases) or are used to support the efficient running of our own internal operations (indirect purchases). Direct purchases vary in complexity from raw materials to complex electronic security systems. Other direct purchases include software platform support, maintenance services, and IT solutions.

Indirect purchases include travel providers, manufacturing consumables, temporary sub-contract labour and other materials.

Given that our operating business is labour based, our labour provider subcontractors comprised the largest group of Tier 1 suppliers.

The vast majority of our Tier 1 suppliers are Australian companies or individuals. We are, however, aware that some entities within other tiers of our supply chain are based internationally.

Secom has developed long-term productive business relationships with our larger suppliers. The terms of these relationships are documented in formal contracts in most cases.

## 1.4. Risks in the operations and supply chains, and Actions

### RISKS and Actions - OUR DIRECT OPERATIONS

Secom rejects any form of modern slavery and is committed to assessing and addressing modern slavery risks and to implementing and enforcing effective systems and controls to combat the possibility of modern slavery practices impacting our direct operations.

The material modern slavery risks present in our own operations are different to those in our supply chain. Our employees are directly employed pursuant to applicable Australian laws such as the Fair Work Act 2009 (Cth) and the relevant industrial award or enterprise agreement.

Further safeguards include those set out below.

#### 1.4.1. Commitment to Corporate Social Responsibility

Corporate social responsibility is integrated into our operations. We conduct our business with high ethical standards to meet financial, community and environmental responsibilities. Above all else, our service delivery is conducted in the interests of people's safety, economic use of resources, environmental sustainability, and compliance with laws such as modern slavery laws. We accept that our actions must accord with the interests of people and society.

#### 1.4.2. Code of Conduct

Our Code of Conduct expresses a comprehensive statement of expectations covering standards, behavior, and governance. It is an expression of fundamental values and represents the framework for decision-making for every employee.

The Code establishes the following ethical business practices:

- we will comply with the law;
- we will act in good faith;
- we will consider the impact of our decisions on our stakeholders (members, employees, customers, governments, and the broad community) and seek fair resolutions;
- we will communicate openly and effectively with our stakeholders; and
- we will seek always to build trust, show respect, and perform with integrity.

We implement the Code of Conduct through policies, procedures and processes which are used throughout our operations. Our integrity, reputation and profitability ultimately depend upon the individual actions of our directors, officers, employees, and representatives. Each is personally responsible and accountable for compliance; and we monitor compliance with our Code of Conduct and promptly act on any breaches.

#### 1.4.3. Policies, Procedures and Processes

Effective governance practices are embedded throughout our organization via a comprehensive suite of policies and procedures which sustain corporate social responsibility. Mechanisms that are relevant for the purposes of identifying and minimizing the risks of modern slavery include the following:

#### 1.4.4. Modern Slavery Policy

In 2020 we developed a modern slavery policy that provides awareness of what modern slavery may encompass, encourages individuals to be on the lookout for and report suspected acts of modern slavery, and sets out how we deal with the issue.

### 1.4.5. Training

Our ability to understand and respond to modern slavery and other human rights issues depends on the identification and reporting of relevant concerns. It is thus imperative that employees, suppliers, contractors, and other relevant stakeholders develop an understanding of what modern slavery issues are, how to report them and how we will deal with them.

## 1.5. ADDRESSING RISKS and Actions- OUR SUPPLY CHAIN

Throughout our relationships with our suppliers, we raise awareness of, and engage them on our expectations regarding minimization and management of slavery and human trafficking risks within our supply chains. Suppliers are regularly reviewed throughout their contractual relationships against such nonfinancial risks.

Our goal over time is to increase and regularly monitor our performance and compliance with our internal policies and processes dealing with ethical practices and the prevention and management of modern slavery risks.

Secom considers that those in our supply chain may be at a greater risk of modern slavery practices than our direct employees, given the possible absence of suitable safeguards, particularly with respect to our security subcontractor suppliers. Our key focus was thus on the implementation of actions to mitigate risks with respect to security subcontractor suppliers.

Actions taken to address risks with respect to our Security Subcontractors included those set out below.

### 1.5.1. Due Diligence: The Supplier Selections Process

During this supplier evaluation stage, due diligence will be carried out on suppliers against the following non-financial risks:

- Responsible Trading Principles – business ethics, anti-corruption and antibribery, governance and legislation;
- Human Rights – working hours, harassment and unlawful discrimination, whistleblowing line, slavery, human trafficking and child labour;
- Health and Safety – workplace and product safety;
- Environment – the impact of operations and products;
- Management systems – environmental management systems certified to ISO 14001; and
- Responsible sourcing.

From this analysis, the risks are assessed, and suppliers will then be categorized as 'low', 'medium' or 'high' risk and appropriate mitigation actions will be introduced.

Suitable suppliers are then approved on our quality assurance and finance systems or otherwise deemed unsuitable.

In 2021 we implemented a new standard subcontract agreement that contains specific provisions regarding modern slavery, places a strong focus on obligations under industrial and work health and safety laws, and guards against potentially problematic practices.

### 1.5.2. Regular Declarations

Our subcontractors are required to provide monthly statutory declarations confirming (amongst other things) that: all their employees have been paid all amounts due to them under the law (including all remuneration and superannuation due); the subcontractor has paid all worker's compensation premiums; the subcontractor has conducted its business in a manner that is compliant with modern slavery laws; and has done all things reasonably required to reduce modern slavery risks in its operations and supply chains.

### 1.5.3. Regular Subcontractor Audits

Periodic audits are undertaken to ensure that subcontractors act in accordance with their contractual obligations and the law.

Secom intends to perform a further risk assessment on the supply chain beyond the first tier in the future and will continue to interrogate our first-tier suppliers to look to identify any potential downstream risks.

### 1.5.4. Action if modern slavery were found in the supply chain

If modern slavery or human trafficking were found within the businesses or supply chains of our directly contracted suppliers, we would act (and already have acted to date) to immediately work with the supplier and relevant authorities to understand the circumstances of what has been found and to then put in place corrective actions that help the affected workers and protect them from further harm. If a supplier is unwilling to address the issue, then corrective action may include termination of contracts and selection of an alternative supplier

## 1.6. Assessment

Secom monitors and reports on a range of indicators to assess the effectiveness of its modern slavery framework, seeking to review and enhance measurement indicators in line with continuous improvement.

Our Risk Assurance Framework includes the following components:

**Level 1 Compliance Team:** The Compliance Team oversees the Modern Slavery Program. This is the first line of defense for managing the program, including the risk management initiatives and plans. Key risk indicators are identified through risk management initiatives and reported monthly through the risk management framework.

**Level 2 Group Risk Committee:** The Group Risk Committee forms the second line of defense, and is an independent and centralized function responsible for analyzing, assessing, and managing risk across Secom. This Group designed and oversaw the implementation of the risk management framework. The Group Risk Committee monitors all material risk.

**Level 3 Group Internal Audit:** The Audit division as the third line, provides independent and objective risk-based assurance to the Group Board. Internal Audit assesses whether material risks have been properly identified and key controls have been properly designed and operate effectively and sustainably to mitigate those material risks

Our modern slavery framework is reviewed annually as part of our regular audit and assurance processes. This includes continuing to assess new suppliers and undertake appropriate supplier due diligence, training staff and suppliers of Secom of behavioral expectations, our Code of Conduct and policies and whistle-blower framework.

The Head of Risk and Operation Manager have primary responsibility for auditing our modern slavery systems and procedures to ensure they are effective in identifying and addressing any identified risks of Modern Slavery in the firm's supply chain.

### **1.7. Process of consultation with entities owned or controlled**

Secom takes a collective approach to address the risks of modern slavery and compliance with modern slavery laws. Our operating entities undertake business have a common philosophy and share the same executive management team. Policies, procedures, and processes of Secom, including this statement, are developed collaboratively, and authorized by the directors of the respective entities.

This statement was approved by the Board of Secom Australia Pty Ltd on 31 March 2022



Name: Daisuke Imahoko, Director

Date: 31 March 2023