



ASSETLINK SERVICES PTY LTD MODERN SLAVERY STATEMENT

Reporting Period 2022/2023





ACKNOWLEDGEMENT OF COUNTRY

We acknowledge the Traditional Custodians of the land and waterways on which we work and live. We recognise their continuing connection to land, water and community. We pay respect to Elders past, present and emerging.

Painting Credit - Meeting Place by Davinder Hart

Davinder Hart is an Indigenous artist whose family roots connect from bibbulmun & Katanning in the South West region of the Noongar people.





About This Statement

This Modern Slavery Statement has been created in accordance with the Australian Modern Slavery Act 2018. While the reporting entity is Assetlink Services Pty Limited, Assetlink's entities take a whole-of-group approach to ethical operations and sourcing. This statement addresses the actions taken by all reporting entities within The Group during the financial year ending 30 June 2023 to identify and mitigate modern slavery risks within the business and across our supply chains.

This report contains forward-looking statements based on assumptions at the time of publication. While every effort is made to deliver on these objectives, altered work environments, including financial, market, regulatory and other risk factors impacting achievement may lead to results being materially different to what is described.

This report was assembled in consultation with all entities via the Assetlink Modern Slavery Committee, chaired by Corporate Risk and reportable to the Assetlink Executive Leadership Team. The Modern Slavery Statement is presented to the Assetlink Services Board for approval.

Reporting Entity

Assetlink Services Pty Ltd

ABN: 89 061 914 556

Registered Address: 6/2-12 Tennyson Road, Gladesville NSW 2111, Australia

Website: www.assetlink.com.au

Industry Sectors: (Including associated entities) Cleaning and Security Services | Construction, civil engineering and building products | Accommodation and hospitality | Information technology and telecommunications.

Mandatory Reporting Criteria

This Modern Slavery Statement covers the activities of The Assetlink Group and its subsidiaries as informed by Section 14 of the Commonwealth Modern Slavery Act 2018, for the period 1 July 2022 to 30 June 2023 (FY23). This statement is structured to meet the mandatory reporting criteria:

- **Section 1:** Structure, Operations and Supply Chain
- **Section 2:** Risk Assessment
- **Section 3:** Risk Mitigation and Approach to Deal with Risk
- **Section 4:** Assessment of Effectiveness
- **Section 5:** Consultation
- **Section 6:** Training and Capacity Building
- **Section 7:** Looking forward.

Author & Assetlink Contact

This Statement has been authored in consultation with the Assetlink Modern Slavery Committee, by:

Christopher Dow | National Safety and Risk Manager, Assetlink Group
Phone: +61 (0)478 017 613 | Email: christopherdow@assetlink.com.au

Reporting Concerns

If you have concerns about modern slavery or human rights issues relating to our operations or supply chain, we encourage you to report your concerns through our Whistleblower Hotline. You may remain anonymous.

Call **1300 361 008** (Australia) or **0800 155 318** (New Zealand) to make a confidential report.



Contents

CEO & MD Message	5
Section 1: Our Structure, Operations and Supply Chain	7
Section 2: Risk Assessment.....	13
Section 3: Risk Mitigation and Approach to deal with Risk	17
Section 4: Assessment of Effectiveness	22
Section 5: Consultation	25
Section 6: Training and Capability Building	27
Section 7: Looking Forward	29



CEO & MD Message

Welcome to Assetlink's fourth Modern Slavery Statement. It is with much pleasure that we share our public commitment to prevent modern slavery risks in Australia and beyond.

Personally, this cause holds significance for me as Modern Slavery contradicts everything we stand for. We all carry a moral responsibility to confront the violation of human rights, however, it is only when we publicly advocate for change, personally lead change, and transform our expectations into tangible improvements, that we can genuinely strive for a world free from exploitation.

Reflecting on our operating environment in FY23, the largest challenges our organization faced was the availability of workers and an increase in inflation. Combined, these two dimensions could create an environment that leads to mistreatment of people or unethical work practices. Identifying these risk drivers early enabled our organisation to double down on our Modern Slavery efforts and ensure we do not compromise our existing practices. We upheld the existing care we have for our people by,

- Sustaining investment in the Health, Safety & wellbeing of our people,
- Upholding our rigorous recruitment practices to employ the best people for the role,
- Investing in our people through continuous training and development, and
- Celebrating our successes and recognizing our people who uphold the values we expect.

Specific to Modern Slavery, FY23 saw further investment and risk mitigation. Highlights from the year include,

- Overhauling policy and procedure, simplifying work processes and clarifying expected practices.
- Integrating improved work practices into existing processes.
- Undertaking continuous evaluation and review of suppliers across the supply chain
- Validating our Work Practices and Supply Chain meet expectation through audit.
- Welcoming independent Audit to validate the controls we describe are in place and effective.

On behalf of the Assetlink Group, I present this statement as a reflection of the efforts by our business respecting the human rights of all those we work with.

This report has been endorsed by the Assetlink Executive, inclusive of the endorsement by each of the Assetlink Group Executive Officers, as required by the Australian Modern Slavery Act. This Statement reports our actions from 1 July 2022 to 30 June 2023. In my role as Chief Executive Officer and Managing Director, I'm pleased to sign this statement which was approved by the Assetlink Services Board on 3 October 2023.

Aurora Fonte
Managing Director, Assetlink Group

07 November 2023



Aurora Fonte
Managing Director,
Assetlink Group



**SECTION 1 – Our Structure, Operations
and Supply Chain**



Section 1: Our Structure, Operations and Supply Chain

Headquartered in Gladesville NSW, Assetlink Services was founded in 1993 to provide cleaning and integrated facilities services to retail, aviation, and commercial sectors. **The Assetlink Group**, as the parent body, now comprises five different entities to provide services across facilities, construction, information technology, and cleaning and security services.

The Assetlink Group directly employs more than 3000 people with 96% employed within Assetlink Services. We have a diverse workforce who hail from around 80 different countries and speak 59 different languages. Within the Group, 40% of the workforce is female and approximately 5% identify as Aboriginal or Torres Strait Islander peoples.



1993

Business Commenced



2,600

Directly Employed Employees



800

Service Provider Team Members



1,800

Sites Serviced in Australia and New Zealand



700

Supplier Organisations Managed



+10

Third Party Modern Slavery Audits Successfully Completed



Certified

Cleaning Accountability Framework Contractor Qualified



96%

Directly employed labour (excluding one contract that is 75% service provider delivered)



Assetlink Services Geographic Presence (Australia)

Including Partner (Contractor) Presence-



Assetlink Services are present at over 1200 locations in Australia and New Zealand.



Our Structure, Operations and Brands



Assetlink Services delivers a fully integrated suite of property soft services. Australia and New Zealand regional management and operational support to delivery premium, innovative and efficient services with a technology platform foundation to drive consistency, reliability, and transparency of operations, safety, contract compliance and continuous improvement.

ABN 89 061 914 556

Est. 1993 | **Employees in two countries** 3,008

Directly employed 80% | **Full-time employees** 46%



AssetFuture provides a comprehensive SaaS solution to support whole of life asset management as well as condition assessment and consulting support. The AssetFuture technological IP drives efficient, objective, comprehensive, and accurate predictive analytics to support both capex and opex portfolio spend.

ABN 79 102 556 623

Est. 2012 | **Employees in Australia** 32

Directly employed 100% | **Full-time employees** 91%



AssetProjects provides construction, refurbishment, and project management support across a range of sectors including Aged Care, Retail, Strata, and government assets. AssetProjects leverages the safety and customer care culture of the Assetlink Group to deliver projects of the highest quality, safety, and reliability.

ABN 47 159 230 592

Est. 2015 | **Employees in Australia** 11

Directly employed 100% | **Full-time employees** 100%



Assetlink Indigenous Services is Assetlink's 51% Indigenous owned joint venture partner. A Supply Nation certified company, AIS is "Powered by Assetlink" and can deliver the full suite of services across Australia but adds a specific focus to support positive outcomes for the Australian Indigenous community.

ABN 29 639 605 904

Est. 2020 | **Employees (in Australia)** 341

Directly employed 41% | **Full-time employees** 39%



Assetlink Village Services delivers fully integrated remote mining village management services supporting catering, housekeeping, wet bar, retail, maintenance, airstrip management, and other services to support FIFO mining operations teams in WA and SA.

ABN 43 159 230 574

Est. 2020 | **Employees in Australia** 85

Directly employed 80% | **Full-time employees** 89%



Our highly skilled and qualified team members deliver professional services to the exacting requirements of our clients and in compliance with our accreditation to:



Operations

The Assetlink Group provides services across a variety of industry sectors ranging from large-scale national portfolios to single-site facilities. We serve Government, Education, Health, Aged Care, Resource & Industrial, Retail and Commercial sectors.

Regardless of entity, Assetlink's businesses are service based with the major proportion of its work and derived income residing within Assetlink Services. As a contracts-based organisation, we obtain and retain contracts to provide services through a tender/negotiation process; resulting in the necessity to continuously improve and identify opportunities to innovate; differentiating Assetlink from market competitors. When awarded new contracts, our people are deployed to client sites where they deliver the contracted services, represent the client's brand and partner closely with the client to ensure the success of their business, sustaining the success of our own entity.

Assetlink is an Australian – New Zealand business, servicing contracts at 1700+ locations in every state and territory of Australia and New Zealand. We have offices in Auckland, Brisbane, Sydney, Melbourne, Adelaide, and Western Australia.

To ensure exemplary delivery of service, we will often draw on the expertise of specialist suppliers and contractors to deliver outstanding services for our customers, upholding our reputation as an industry leader. When it comes to Modern Slavery, we expect our suppliers and contractors to comply with our performance standards and expectations on Modern Slavery.

Supply Chain

The Assetlink Group procures services and goods primarily through Australian and New Zealand suppliers. We recognise that even locally sourced commodities can be linked to overseas supply chains. Regardless of source of origin, the size of the entity or the volume of spending, the expectations for our suppliers held to the same rigorous standards.

Procurement across the Group is undertaken through our Procurement and Supply Chain function, which supports a consistent, Group-wide approach to modern slavery risk management in relation to our suppliers.

Our Procurement team, in collaboration with our Compliance function, lead the strategic sourcing, supplier assessment, pre-qualification and onboarding processes. The contractual expectations for our suppliers are defined by the Finance (Commercial) function.

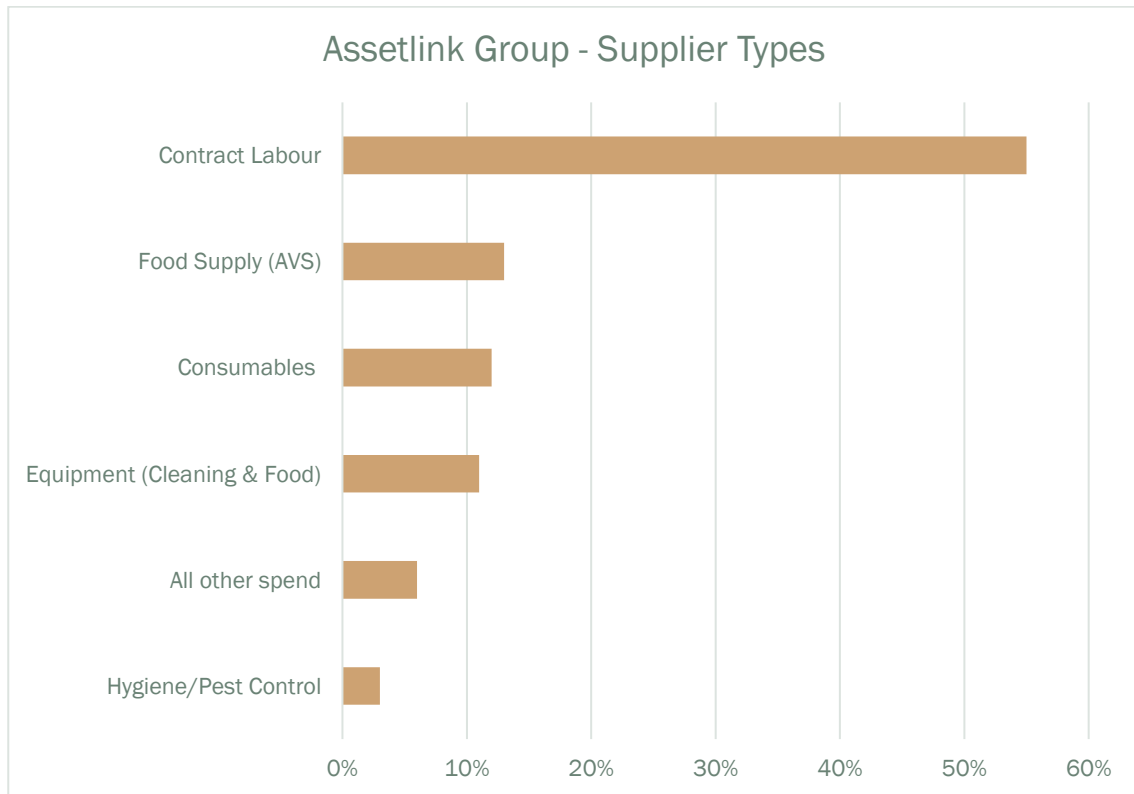
Once approved, each business unit / function is responsible for oversight and governance, including management of risk.

Any supplier now working with Assetlink will experience greater rigour in their initial Pre-Qualification. To be CM3 qualified, any provider (supplier or contractor) must now complete additional pre-qualification checks relating to Modern Slavery.

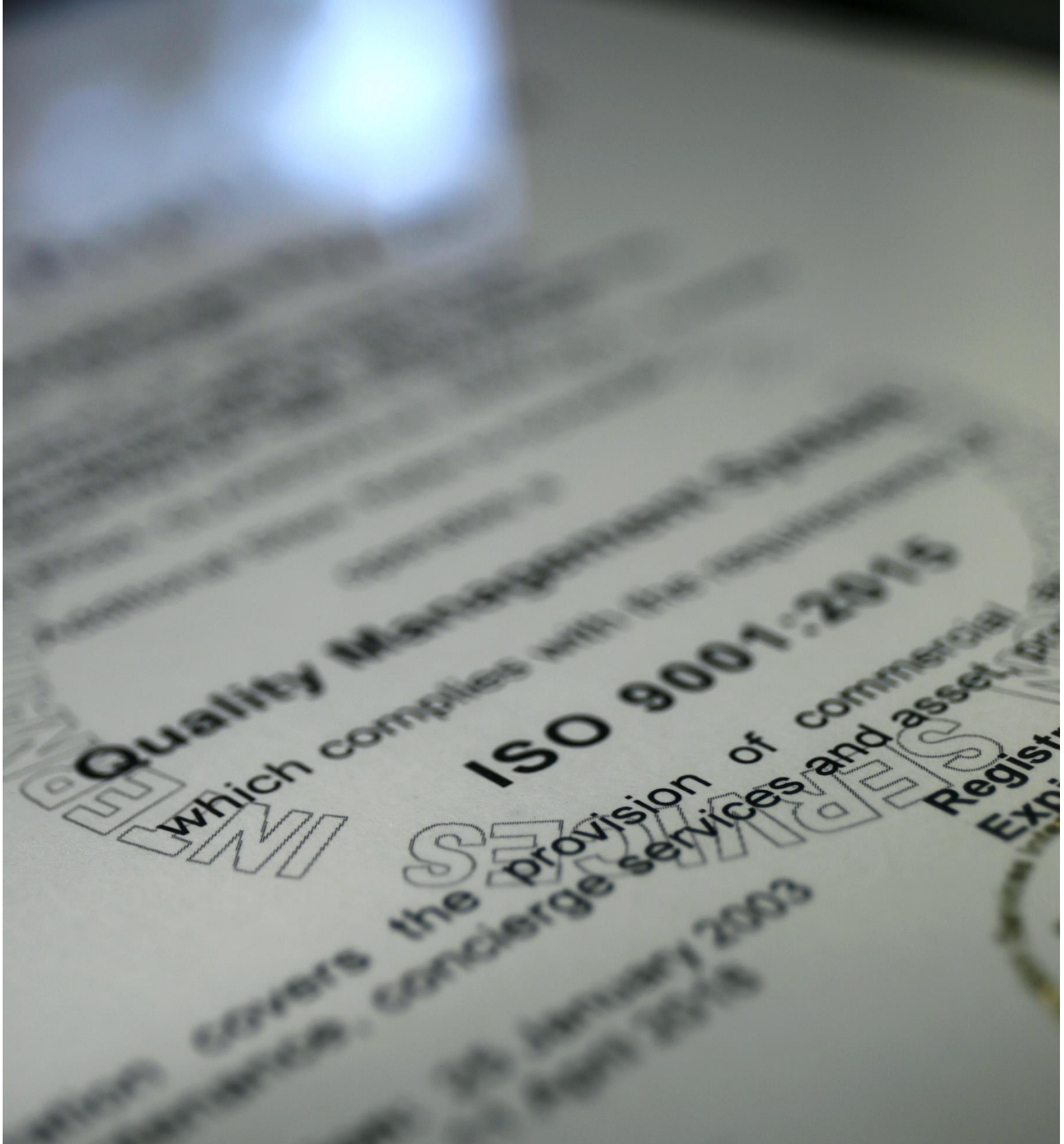


Supply Chain at a Glance

While the Assetlink Group source their supplies through 700 vendors (FY23), 94% of this spend is with just 100 businesses. A breakdown of Supplier types is detailed below.



In FY23, a concerted effort was invested into reducing our Supplier risk exposure. Assetlink reduced the total number of providers by 35%, consolidating and rationalizing our provider base while increasing the Pre-Qualification criteria to identify Modern Slavery risk, prior to engaging with them. Additional upside was realized by reducing administrative burden overseeing a large supplier base.



SECTION 2 – Mitigating Modern Slavery Risk



Section 2: Risk Assessment

Macro Risk Context: Services Industry in Australia and New Zealand

While the Global Slavery Index indicates that with our operations and supply chain undertaken predominantly in Australia and New Zealand, we are considered low risk, we also acknowledge the industry sectors of Cleaning and Security are recognised as high-risk industries.



Source: Global Slavery Index (Regional Findings – Asia and the Pacific) (2018)

Assetlink continue to monitor the global, macro-risk environment to identify external trends that may influence our response to emerging threats beyond our borders. Additionally, regular literature reviews help guide us with our mitigation strategies. We draw on the learning experience of others (esp. in the UK who have had their Modern Slavery Act in place since 2015) to aid us in identification of Risk Management best practice.



Sector & Population Vulnerabilities

Operations and Supply Chain risks by Assetlink service offer:

Service	
Cleaning	●
Consumables	●
Laundry	●
Waste	●
Pest Control	●
Grounds and Landscaping	●
Security	●

Risk Rating: ● Very High | ● High | ● Medium | ● Low

By monitoring external data against the industry sectors by service, allows Assetlink to better understand our risk profile and ensure adequate resource to offset harm.

Identification and Assessment of Risk

The complexity of our industry, the nature of a geographically dispersed workforce and the nature of the work carried out through partner Service-Providers (contract workforce) are the principal areas of risk within our business.

In FY23, following the successful improvements to risk mitigation, we welcomed external Audit from our clients to confirm our residual risk controls remain effective. Drawing on the expertise of Ernst & Young, KPMG and Bureau Veritas provided external validation of continuous improvement.

Volume of suppliers was identified previously as a risk control and in FY23 the total number of suppliers was reduced by 35%.

Through evaluation of operations and supply chain, Assetlink has self-assessed the internal risk of modern slavery within our business as low. Sources used to inform our assessment include the: Global Slavery Index, the Responsible Investment Association Australasia and feedback from external (Modern Slavery) audit.

Operations and Supply Chain Risk

Our People:

As 96% of Assetlink's labour is directly employed, and this provides us direct control over the Employee Lifecycle – recruitment, onboarding, training, performance management and wellbeing programs for our sites – critical to ensuring our policies for the elimination of Modern Slavery is upheld.

With expectations to mitigate risks detailed in policies, and procedures, coupled with training and development in these expectations, ensures team members are free from modern slavery risks and are aware of what constitutes modern slavery.



Our team members are paid in alignment with the relevant Award, wages are paid by Electronic Funds Transfer into an individual's bank account. Financial audits validate compliance with defined operating procedures. External Audit by our Clients and Assurance bodies validate Modern Slavery Risk Controls, confirm our payroll aligns with employee contracts and salary. Internal and external audits confirm we do not,

- Unlawfully withhold wages.
- Withhold identity documents.
- Drive excessive work hours or restrict movements.
- Deduct any fees (beyond regulatory or legislative requirements) for remuneration.
- Allow loans to employees.

Our Contract Workforce:

Where additional subcontracted services are used (e.g., specialist cleaning services such as external high glass or hygiene services), Assetlink engages strategic partners through formal commercial agreements.

In **FY23**, we progressed our evaluation of suppliers, risk rating them and identifying improvement opportunities for both the vendor and us. This in turn led to further roll-out of the Modern Slavery Survey to lower-risk providers. Preliminary work was completed to embed a more rigorous Modern Slavery survey into our pre-qualification process. Additionally, we reduced our total number of contractor providers to further lower our risk exposure.

Our commercial agreements with our contract workforce include a commitment to regular compliance audits conducted by Assetlink's Service Provider Compliance Manager to ensure our partners continue to deliver their services in line with expectations.

Our Consumable Suppliers:

Our long-term suppliers of equipment and products for cleaning services, are well renowned and we have worked closely with them for many years.

In **FY23** there were no material changes to our scope of work which did not lead to any departure from our current supplier base. From a risk identification perspective, Assetlink deployed additional mechanisms to identify and flag non-conformances in our supply chain. We set in place triggers to identify providers and define actions we take when non-compliance is identified. These actions were updated into our Procurement and Modern Slavery Operating Procedures.



SECTION 3 – Mitigation and Approach to Managing Risk



Section 3: Mitigation and Approach to Managing Risk

Identifying and Managing Modern Slavery Risks

The approach to identifying and managing Risk in Assetlink is based on the principles of,



The process for the identification and management of Modern Slavery Risk in Assetlink is aligned to the foundation’s principles of ISO31000 and is further defined in the Assetlink Group Risk Management Standard.

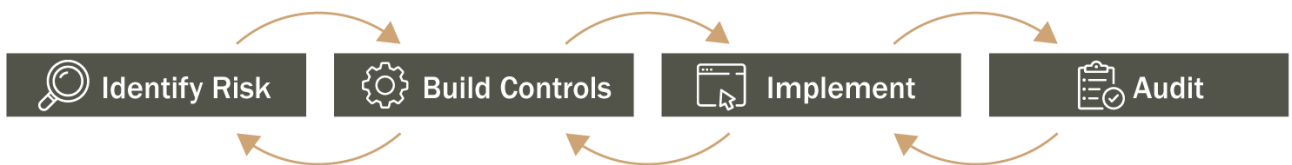
FY23 saw a continuation of our evolving strengths identifying and managing Slavery risks. A review of our enterprise risk assessment was undertaken, enhancing our risk treatment activities. Implementation of these improvements were prefaced with an overhaul of our Modern Slavery Policy. This policy was subsequently complimented with improved operating procedures detailing how we meet the objectives of the new policy.

External evaluation of our Modern Slavery management practices indicated our organization has matured significantly in the last 12 months.

Of all Audits conducted in FY23, the only identified gap related to our response following identification of Child Labour. While internal controls effectively eliminated the risk, response actions were agreed and documented into our procedure should we discover any contractor who is in breach.

Risk Management:

The process of risk management can be summarised as follows:



Implementation of Controls is expanded further and considerations, include:

Implement Controls		
Document	Communicate	Train
Risk Assessment controls documented into Policies & procedures.	Engage, consult & collaborate with audiences.	Impart content of policies & procedures to learners.



Risk Themes:

The risk themes identified in the Modern Slavery Corporate Risk Assessment, include:

- Risk Identification & Governance
- Audit & Assurance
- Client Engagement
- Training & Education
- Supply Chain
- Contractual & Commercial Obligations
- Recruitment & Human Resources

Each theme is expanded to address potential sources of harm and controls documented in the Corporate Risk Assessment. The outputs of Modern Slavery Risk Assessment can be found in the Assetlink Services Corporate Risk Register – Section 4.0 Modern Slavery.

With well-embedded ways of working, (mitigating modern slavery risks) the organization has seen a cultural shift away from ‘apply controls’ to more mature acceptance of new ways of working by building efficiency in the way that we work. It is anticipated that this level of maturity on our journey will also shift the focus of the Modern Slavery Committee to focus more closely key dimensions of the Act (Organisation structure, Operations and Supply, Consultation and Training)) for further improvements.

Governance & Risk Oversight:

Aligned to the identified Risk dimensions (above); a functional body responsible for identification and remediation of Modern Slavery risk has been appointed by the Assetlink Group Executive. This body, known as the Modern Slavery Committee, is chaired by the National Safety and Risk Manager and reports directly to the Executive Leadership Team. The National Safety and Risk Manager provides updates on Modern Slavery Risk to the Assetlink Group Board.

Modern Slavery Committee Members:

- The Assetlink Governance Team Responsible for delivering the strategic intents of Modern Slavery are made up of representatives with the greatest opportunity to alter work practices. The committee comprises,
- National Safety and Risk Manager (Chair)
- National Human Resources Manager
- Chief Financial Officer
- General Manager Business Development & Client Relations
- National Compliance Manager
- National Supply & Procurement Manager
- Director, Commercial
-
- The Committee Chair reports to the Executive Leadership Team and Modern Slavery insights are tabled in Board Risk Reports.

In **FY23**, with no material change to operations, supply, or associated risk, the Modern Slavery Committee focused on maintaining a watching brief of Performance Indicators as opposed making fundamental shifts to risk down.



Risk Management through Partner Suppliers:

While the Assetlink Group has robust processes and systems for the identification and management of risk, we acknowledge there is less oversight of our partner suppliers and rely on self-assessment and assurance insights of our suppliers to confirm expectations are upheld. To minimise risk, Assetlink adopts a risk-based approach when deciding whether to conduct more detailed due diligence on our supply network.

(see Section 2 – Risk Assessment). Risk factors include type of goods or services, country of origin and supplier.

Before engaging with a new supplier, the risk profile of that supplier is assessed against defined business criteria. Higher risk suppliers to complete additional risk assessment questionnaire and/or be audited.

In FY23, the overall Supplier numbers were reduced by reconciling services and providers through rigorous review. A smaller pool reduces the resource drain to administer compliance. In addition, it provides deeper working relationships that aren't possible with multiple providers.

Complimenting better supply management was the digitization of the vendor procurement process that delivered a more visible and transparent process for selection and onboarding of new providers.

Irrespective of Modern Slavery Risk, new suppliers must continue to meet pre-qualification requirements to be an approved supplier to the Assetlink Group. They must complete a contractor pre-qualification (CM3) and a Due Diligence Check and Risk Assessment.

The prequalification and onboarding process is overseen by Assetlink's National Supply Chain Manager, and National Compliance Manager. The current CM3 pre-qualification includes an Ethical Sourcing Questionnaire which covers key aspects of vendor operations (supply chain, labour hire, employment practices, industry type). Suppliers are assessed to identify the risks of the supplier possibly breaching Assetlink's ethical sourcing and anti-slavery policies.

Ongoing risk assessments and audits are conducted with our suppliers with any non-conformances reported and tracked to ensure closure and resolution. Regular awareness communication on various topics including modern slavery is undertaken with suppliers and employees.

Risk Calibration: Collaborating with other businesses, government and non-government organisations.

- To ensure a consistent appreciation of risk that is aligned to community standards and appreciation of risk, Assetlink draws upon the following globally recognised declarations, principles, and goals:
- Universal Declaration on Human Rights
- United Nations Guiding Principles on Business and Human Rights
- United Nations Global Compact
- International Labour Organisation Declaration on Fundamental Principles and Rights at Work
- United Nations Women's Empowerment Principles
- United Nations Sustainable Development Goals

Assetlink is a member of the Supply Chain Sustainability School of Australia (SCSS). The SCSS aims to create sustainable supply chains for property, construction and infrastructure industries in Australia and provides by providing collaborative, accessible education for a sustainable future.



Industry Associations

Assetlink align with Anti-Slavery Australia regarding foundation training for all employees in the understanding and eradication of Modern Slavery.

Additionally, Assetlink has been assessed by the Cleaning Accountability Framework (CAF) association, who are recognised as a leading anti-slavery in supply chains initiative by business and human rights and corporate social responsibility experts.

CAF addresses Modern Slavery risk in the Cleaning Supply chain by engaging with employing entities as well as setting and validating employment practices.

As Modern Slavery becomes more mainstream in Australia, relevant Professional Associations support their members through professional development and access to thought leadership via body-of-knowledge resources and professional development. The Australian Institute of Company Directors (AICD) and the Risk Management Institute of Australia have been sources of guidance to ensure best practices meeting Modern Slavery requirements.

Implementation Actions:

1. Communicating Assetlink Standards to Suppliers

We work with our suppliers to source goods and services in a manner that aligns with our policies including our Anti-Slavery Policy. We encourage our suppliers to promote best practice and continuous improvement, require our suppliers to comply with certain minimum standards and provide Assetlink with rights of termination if the supplier is unable or unwilling to work towards full compliance with these minimum standards.

2. Training and Capability building

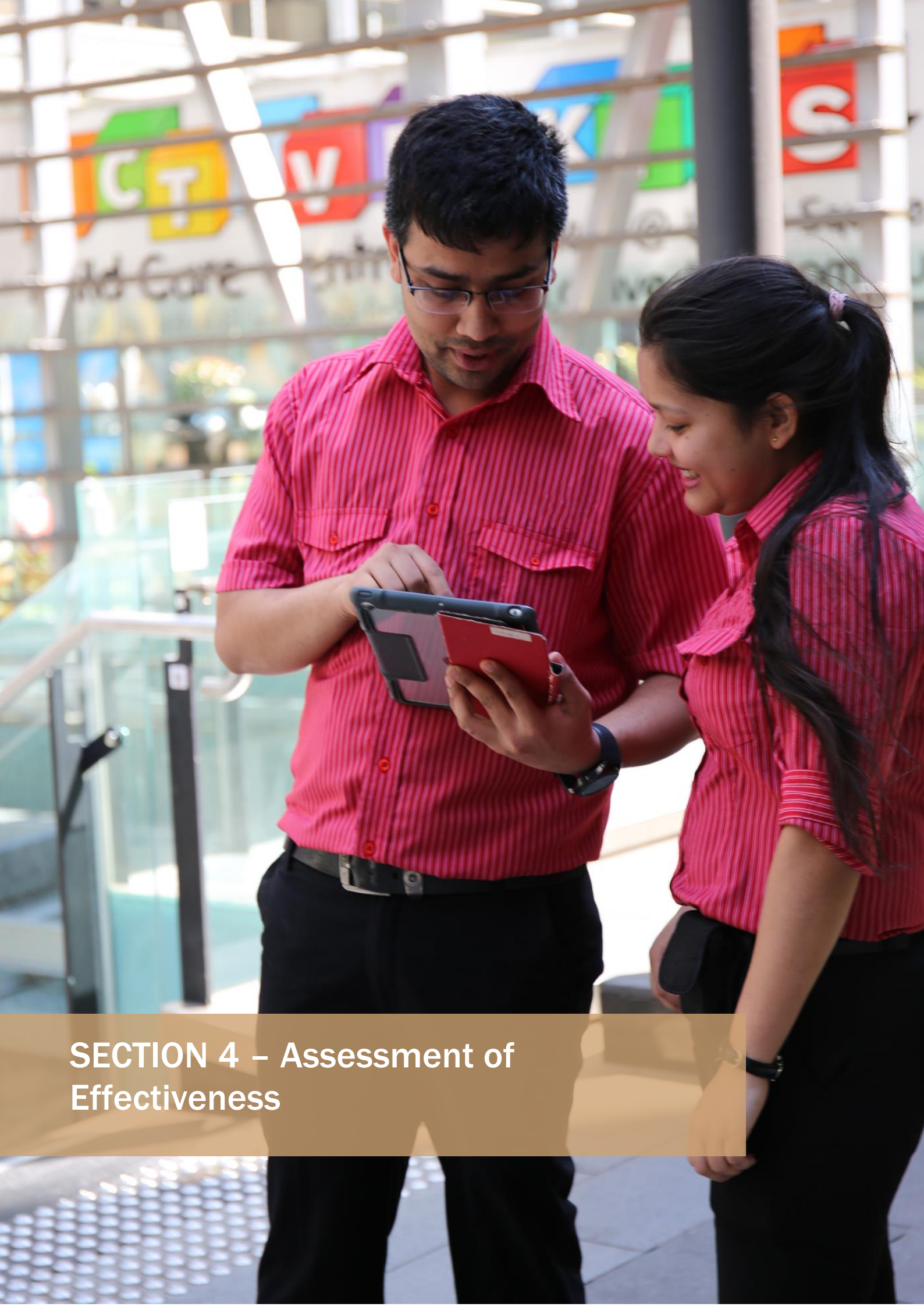
Assetlink maintains ongoing focus on training and capacity building. Modern Slavery awareness training has been deployed through all entities, together with awareness of Whistle blower hotline and procedures.

3. Reporting and monitoring of grievance mechanisms

Assetlink has a Whistle blower Hotline in place as well as an internal process for lodging any grievance. The Whistle blower hotline is an external confidential service. Any complaints are reported and reviewed by the Modern Slavery Committee and Executive Leadership Team. This may be incorporated in the Corporate Risk monthly report. Any matters that need further escalation are reported to the Board.

In FY23, the Assetlink Modern Slavery Committee monitored performance indicators to confirm objectives are met. These metrics include Committee Meetings held, Training Completion, Statement Publish, Supplier management (number, risk, audited, etc.,) and Audit Findings (including Corrective Action closeout).

Further, where clients had their own Whistle blower hotlines or access points, these were proactively communicated to Team Members based at those sites.



SECTION 4 – Assessment of Effectiveness



Section 4: Assessment of Effectiveness

As the fourth iteration of Assetlink’s Modern Slavery Statement, our appreciation and maturity managing effectiveness of Modern Slavery risk and outlines the steps we are taking to ensure the elimination of servitude in all its forms are not present within the Assetlink Group or through our supply chains.

‘Effectiveness’ is defined as the validation of action to reduce the risk of exposure. A summary of our FY23 evaluation is detailed below.

Risk Dimension	How we Assess	FY23 Outcomes (Evidence)
Policy & Governance	<ul style="list-style-type: none"> Regular Policy and procedure review Implementation of policy in workplace Modern slavery committee in place and meeting regularly. 	<ul style="list-style-type: none"> Committee meeting minutes Simplified & republished Modern Slavery policy (previous, Anti-Slavery Policy) Created Modern Slavery procedure defining actions required to meet the policy objectives
Risk Profiling	<ul style="list-style-type: none"> Continuously review and improve the Corporate Risk Assessment relating to Slavery. Evaluate change to Client, Vendor and workforce to identify and manage new risks. New Vendors issued 	<ul style="list-style-type: none"> Undertook select audits at 10 sites. Confirmed defined controls matched workplace application. Conducted randomized salary reviews of team members at select sites confirming alignment of Position Description, Contract, & Salary.
Audit & Assurance	<ul style="list-style-type: none"> Audit undertaken against schedule. Undertake external, independent audit of internal Assurance strategy 	<ul style="list-style-type: none"> Audit schedule and progress to plan reported monthly in Compliance Manager ELT reports. No major non-conformances identified (internal or external audit)
Performance Monitoring	<ul style="list-style-type: none"> Regular performance monitoring and publishing of results to ELT. Metrics currently monitored: <ul style="list-style-type: none"> Meetings Held to plan. Modern Slavery Training Statement Publish Strategic actions to plan Non-conformances Audits to plan 	<ul style="list-style-type: none"> 90% of Meetings Held to plan. Modern Slavery Training > 70% Statement Published & available. Zero breaches Audits to plan (110%)
Training & Development	<ul style="list-style-type: none"> Effectiveness of training measured through uptake (completion of training) and workplace application. 	<ul style="list-style-type: none"> All Team Members (3000+) have Modern Slavery training assigned as a mandatory training requirement
Grievances & remediation	<ul style="list-style-type: none"> Monitor reporting trends (Volume & nature) Team Member feedback Supplier feedback 	<ul style="list-style-type: none"> Actions responding to grievances were documented in updated slavery response procedure. There were no grievances raised via our internal reporting hotline. No clients raised employee grievances from any team members accessing their grievance reporting mechanisms. No supplier grievances were raised.



Summarising: In FY23, effectiveness of our Modern Slavery actions were validated through,

- Positive feedback from Client audit via Tier 1 consultancy firms.
- Overhaul and review of the Modern Slavery Risk Assessment, ensuring actions were fit for purpose and inclusion of Assurance actions against the
- Deployment of an enhanced Supplier Evaluation survey to gain objective data on our supplier risks.
- Agreement and initial publish of Modern Slavery Performance Indicators

Further improved training completion in Modern Slavery, inclusive of grievance and whistle blower procedures.

While we recognise we still face many challenges as our awareness and maturity in Modern Slavery increases, we remain confident that our current assessment of risk and our policies and procedures create strong foundations by which we will continue to improve.

Through regular internal and external assurance, audits of our suppliers, training and capability building, the close and long-standing relationships we have with our suppliers, and the processes we've put in place, providing employees and suppliers with an external Whistle blower hotline and grievance procedures, we are able to continually monitor where we and our suppliers are with regard to modern slavery risks.

In FY23, we continued our track record of zero modern slavery complaints against Assetlink, or our suppliers, made through internal or external channels such as our Whistle blower hotline.

Auditing Suppliers

Offsetting the risk of unethical practices occurring within our supply chains, we apply our own modern slavery and ethical sourcing audit programs using a risk-based approach.

Where non-compliance with Assetlink's Anti-Slavery Policy is identified, the supplier is contractually required to remediate the issue. If a supplier then addresses non-compliance, it continues to be an approved supplier. If a supplier is not willing or unable to address a critical breach, we will not continue to engage with that supplier.



SECTION 5 – Consultation



Section 5: Consultation

Assetlink Group Entities:

Section 1 detailed the organisation structure for the Assetlink Group and the related entities aligned to the submission of this Modern Slavery Statement.

With common, shared services across the group (Finance, Payroll, Safety and Risk, Human Resources, Information Technology) and group-wide Management Systems detailing our policies and procedures, all Assetlink entities, including our New Zealand operations, meet the requirements of the Group Modern Slavery objectives.

Consultation and awareness of expectations are achieved through representation on the Executive Leadership Team, overseen by the Group Managing Director and CEO.

Third Parties:

Relationships and collaboration with our suppliers, business partners and relevant government agencies assist us in shaping our strategies on modern slavery.

As a member of the Supply Chain Sustainability School of Australia (SCSS) we aligned to the SCSS objectives of creating sustainable supply chains for the property, construction, and infrastructure industries in Australia.

Our membership provides collaborative, accessible education to realise this future vision. Pleasingly, many of our clients are members of SCSS and together with their internal forums, we can collaborate on how we go forward together in the fight against modern slavery.

Some Clients have created regular meeting events to engage and connect on Modern Slavery. These forums allow us to share progress with our initiatives, understand client needs and leverage identified best practices from other suppliers.

In FY23 improvements to the way that we Consult, Communicate, and encourage active Participation from our workforce were overhauled and improved. These improvements were subsequently formalized into an improved management standard that details the minimum requirements for effective consultation, communication and change in the workplace.



SECTION 6 – Training and Capability Building



Section 6: Training and Capability Building

Awareness-raising is crucial in helping prevent and address modern slavery in our business and supply chain.

We ensure all our Team Members are aware of our commitments to eliminating Modern Slavery – what it is, how it might exist in the workplace and how to respond if exposed to

The ultimate measure (by our own people) that our Modern Slavery practices are effective is if they tell us. Equally if they flag failure through our whistleblower hotline, it identifies gaps. Thankfully, in four years we have not had any breaches of our policy.

To sustain a culture where our people are empowered to speak up and report while upholding a track record of zero failures, can only come from a workforce who knows what is expected.

Assetlink's Modern Slavery awareness online training module continues to remain a mandatory training requirement for all employees and suppliers. When commencing employment with Assetlink, our people complete training on our Standards of Business Conduct as part of their induction process. Compulsory refresher training is undertaken annually.

We revised and developed, consulted, communicated and rolled out new and refresher policies and documents including our Anti-Slavery Policy, Whistle blower hotline, Business Code of Conduct, Corporate and Social Responsibility Policy (includes amongst other things - Workforce Stewardship, Freedom of Association, Sustainable Supply Chain, Corruption, Bribery, Distortion, Labour Standards and Human Rights), Inspections, Audits, Complaints and Improvements Policy, Diversity & EEO Policy, Grievance Procedure, Employee Management Policy, supplier audit procedures and related processes, which detail our expectations around modern slavery, sustainable procurement and supplier conduct.



SECTION 7 – Looking Forward



Section 7: Looking Forward

Assetlink will continue to ensure the prevention of modern slavery throughout our business and with those we work with. Bettering our performance and aligned to our modern slavery risk assessment, initiatives planned for FY24 to further eradicate Modern Slavery, include:

Dimension	Actions Planned for FY24
Risk Identification & Governance	<ul style="list-style-type: none">• Publish Modern Slavery performance indicators in corporate risk reports.• Validate risk controls through audit.• Detailed enhancements to risk management in FY24 statement.• Document governance structure and publish in FY24 statement.
Audit & Assurance	<ul style="list-style-type: none">• Continually review existing controls.• Enhance assurance actions, documenting all activities to validate controls are in place and effective.• Incorporate Modern Slavery as a risk type in our Corrective Action system.• Sustain track record of no major non-conformances.
Client Engagement	<ul style="list-style-type: none">• Include Modern Slavery performance in client performance reviews.• Align with more client whistle-blower programs
Training & Education	<ul style="list-style-type: none">• Publish training performance monthly.• Drive completion by entity.
Supply Chain	<ul style="list-style-type: none">• Complete assessment of all Suppliers• Embed Modern Slavery assessment into onboarding actions for new suppliers.• Undertake audits of high-risk Tier 1 suppliers
Contractual & Commercial Obligations	<ul style="list-style-type: none">• Ensure all new and existing clients have updated contracts that are inclusive of modern slavery expectations.
Recruitment & Human Resources	<ul style="list-style-type: none">• Enhance grievance procedure.• Update and strengthen related policies (EEO etc.) to incorporate more explicit Modern Slavery references.• Explore payroll system enhancements including automation

Progress to our FY24 objectives will be via the Modern Slavery Committee and improvements measured through Performance Indicators.

End of Statement



Version History

Reporting Period	Summary of Changes / Edits	Author
FY20	Initial Release	Janine Rauscher
FY21	<ul style="list-style-type: none">• Confirmed content.• Minor formatting changes to improve readability.• Added Author and Contact details.• Reflected FY21 actions/achievements	Chris Dow
FY22	<ul style="list-style-type: none">• Complete review of all sections• Update of content to reflect practices.• Readability improvements• Highlight boxes to detail achievements of the reporting period.	Chris Dow
FY23	<ul style="list-style-type: none">• Review and update all sections.• Document FY23 achievements.• Define FY24 objectives	Chris Dow

AUSTRALIA

New South Wales

6/2-12 Tennyson Road, Gladesville NSW 2111
T +61 2 9857 7100 F +61 2 9877 5888

Victoria

198A Turner Street, Port Melbourne VIC 3207
T +61 3 9682 6066 F +61 3 9645 8049

Queensland

Unit 5, 29 Links Ave Nth, Eagle Farm QLD 4009
T +61 7 3868 4099 F +61 7 3868 4299

Western Australia

Unit 25, 25 Walters Drive, Osborne Park WA 6017
T +61 8 9244 4151

South Australia

33/ 283-287 Sir Donald Bradman Drive, Brooklyn Park SA 5032
T +61 3 9682 6066 F +61 3 9645 8049

NEW ZEALAND

Auckland

Suite 913A, Botany Town Centre, 588 Chapel Road, East Tamaki 2016
T +64 9 265 2744

