

Modern Slavery Statement



2021

CERTIS  **SECURITY**

Disclosure Note

This statement has been made on behalf of Certis Australia Pty Ltd. This Statement covers all entities owned or controlled by Certis Australia Pty Ltd which are Certis Academy Australia Pty Ltd, Certis Security Australia Pty Ltd, Certis Security Australia (Victoria) Pty Ltd, Certis Security Australia (WA) Pty Ltd, Newcastle Security Pty Ltd, PSI Corporate Pty Ltd, Sydney Night Patrol & Inquiry Co Pty Ltd, and Corroboree Certis Indigenous Corporation.

These entities will be referred to in this Statement hereafter as “Certis Australia”.

EXCLUSIONS

PSI Corporate Pty Ltd – this entity is not currently undertaking any commercial transactions.

AUSTRALIAN BUSINESS NUMBERS

ABN 51 602 871 287 – Certis Australia Pty Ltd
ABN 99 636 999 703 – Certis Academy Australia Pty Ltd
ABN 90 003 762 150 – Certis Security Australia Pty Ltd
ABN 41 105 638 254 – Certis Security Australia (Victoria) Pty Ltd
ABN 34 132 818 421 – Certis Security Australia (WA) Pty Lt
ABN 71 306 642 945 – Corroboree Certis Indigenous Corporation
ABN 11 124 839 461 – Newcastle Security Pty Ltd
ABN 24 611 391 998 – PSI Corporate Pty Ltd
ABN 11 000 013 098 – Sydney Night Patrol & Inquiry Co Pty Ltd



Contents

Disclosure Note	2
About Us	4
Our COVID-19 Response	5
2021 Modern Slavery Risk Management Initiatives	6
Our Plans for 2022	6
Our Plans beyond 2022	6
A Brief Statement from Tom Roche, Chief Executive, Australia	7
Reporting Criteria 1 & 2: About Certis Australia	8
Our Organisational Structure	8
Our Operations	8
Our Supply Chain	11
Reporting Criteria 3: Modern slavery risks in operations and supply chain	13
Reporting Criteria 4: Actions taken to assess and address risk	16
Board and Executive Engagement	16
Responsibilities for Modern Slavery	16
Risk Framework	16
Modern Slavery Policy	16
Whistleblowing Policy and Disclosure Procedure	16
Education and Training	17
Procurement and Supplier Procedures	17
Subcontractor Due Diligence	18
Reporting Criteria 5: Effectiveness Assessment	21
Reporting Criteria 6: Process of consultation with entities owned or controlled	22
Reporting Criteria 7: Other	22



About Us

While the Certis name only appeared on the Australian security landscape in 2016, our family-owned legacy businesses – SNP Security and BRI Security – have been around much longer than that.

SNP Security was founded in 1923 and over the years has gathered unparalleled security expertise in industries including aviation, transport, logistics, critical infrastructure and commercial precincts.

BRI Security was established in 1993, and has been a pioneer in harnessing technological innovation to provide leading edge, comprehensive security and safety products and services to the corporate sector.

Certis' acquisition of SNP and BRI is the next evolution in this Australian success story. Beginning in Singapore and backed by over 60 years of experience in physical security, market insights and patented technology innovations, Certis is renowned as a trusted integrated security services provider for businesses around the globe – and now in Australia too.

We are pleased to publish our second Modern Slavery Statement.



Vision

To be **the most advanced integrated security services** partner globally, making our world safer, smarter and better by everything we do.



Mission

As **trusted partners**, we protect lives and assets and deliver integrated critical services.



Values

- Safety
- Professionalism
- Integrity
- Customer focus
- Team work
- Care
- Courage

Our COVID-19 Response

With the continuation of the pandemic throughout 2020 and 2021, we focused on keeping our people safe and well, maintaining reliable operations and supporting our communities. We continued to review the information provided by the Commonwealth Department of Health, and closely monitored and responded to the developments in Australia.

THESE RESPONSES INCLUDED

- Keeping employees and subcontractors updated on the developments, signs and symptoms of COVID-19, and the testing locations;
- Limiting non-essential organised gatherings;
- Limiting non-essential meetings and conducting meetings via online video conferencing;
- Distributing the Department of Health’s COVID-19 infection control training to employees;
- Providing PPE across all operational and office based sites;
- Issuing ‘Tool Box Talks’ on correctly wearing face masks, social distancing and hand sanitising;
- Initiating a COVID-19 Safety Plan for corporate offices and operational sites as required;
- Continuing our working from home strategy for office employees ;
- Facilitating QR Codes for COVID-19 safe check in at corporate and operations work sites as required ;
- Distributing information and links for counselling and wellbeing services to our staff; and
- Developed an app for staff to register COVID-19 vaccination status and COVID-19 testing requirements.

As a result of COVID-19, many services continued to be limited including national and international travel. As such, our security services to the aviation industry during this reporting period remain well below pre COVID-19 levels.

We continued to engage with our suppliers to understand the impact of COVID-19 on their businesses and to work with them to help where we can. Our operations and administration teams worked together to manage critical supplies to support our staff out in the communities, including sourcing of personal protective equipment.

2021 Modern Slavery Risk Management Initiatives

In 2019/20, we focused on enhancing our understanding of our human rights and modern slavery risks and impacts and formed a modern slavery working group. While our focus in FY20 was on understanding our supply chain risks, in FY21 we have spent time better understanding the risks posed by our subcontractors. We formalised our Modern Slavery Policy, prepared subcontractor education and awareness materials, undertook subcontractor audits which included a review of migrant worker visa conditions and pay rates, and worked with subcontractors to address any non-conformances. With the support of external consultants, we reviewed our procurement and subcontractor management policies and procedures and will roll out updated documentation in FY22.

Our Plans for 2022

Our plan for FY22 is to continue to raise awareness about modern slavery risks among our employees, suppliers and subcontractors. We will formalise roles, responsibilities and accountabilities for modern slavery risk management and expand our enterprise risk framework to ensure modern slavery risks are integrated into risk assessment processes. We will undertake follow up audits of subcontractors that sit within our top 80% of spend and undertake deep dive assessments of our potentially highest risk direct suppliers.

Our Plans Beyond 2022

Beyond 2022 we will review, extend, evaluate and improve our modern slavery risk management program. Our priority will be to establish performance standards and evaluation criteria for our suppliers and subcontractors, and develop collaborative corrective action plans to strive for continuous improvement.

A Brief Statement from Tom Roche, Chief Executive, Australia



We are proud of the ongoing commitment of our Senior Leadership Team to manage modern slavery risks across our operations and supply chain, particularly given the ongoing challenges presented by COVID-19.

Over the past 12 months we have refined and expanded our supplier and subcontractor due diligence processes for modern slavery, with a particular focus on subcontractors. Our subcontractor audit program ensures we have oversight of the systems and processes our subcontractors have in place to manage modern slavery risks and worker exploitation.

We have continued to roll out training and awareness materials to ensure that our staff and subcontractors are aware of our responsibilities to prevent and mitigate modern slavery, and importantly know what to do in the event that modern slavery is identified anywhere in our operations or supply chain.

This Modern Slavery Statement builds on our previous Statement and highlights in particular the actions we have taken in this reporting period. We remain committed to managing modern slavery risks in our operations and supply chain and embrace our responsibilities under the Modern Slavery Act 2018.

TOM
—

Reporting Criteria 1 & 2: About Certis Australia

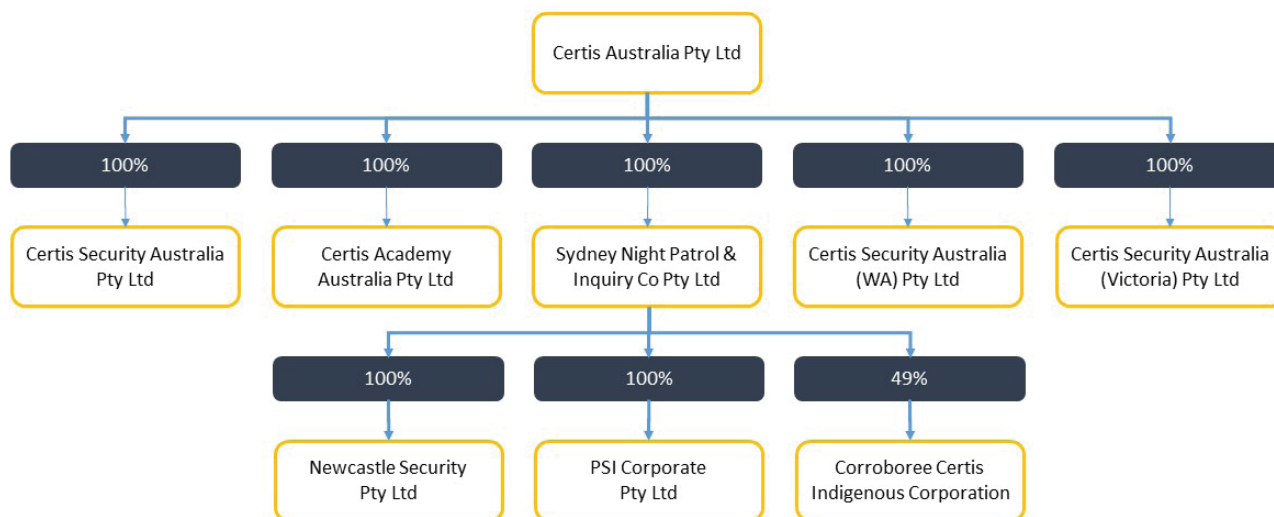
Our Organisational Structure

Certis Australia Pty Ltd is the holding company and 100% owner of Certis Security Australia Pty Ltd, Certis Academy Pty Ltd, Certis Security Australia (Victoria) Pty Ltd, Certis Security Australia (WA) Pty Ltd, and Sydney Night Patrol & Inquiry Co Pty Ltd.

Sydney Night Patrol & Inquiry Co Pty Ltd owns 100% of Newcastle Security Pty Ltd and PSI Corporate Pty Ltd.

Additionally, Sydney Night Patrol & Inquiry Co Pty Ltd is a 49% shareholder of Corroboree Certis Indigenous Corporation.

Certis Group Structure - Australia



Our Operations

OFFICE LOCATIONS

Head Office West Ryde, NSW
 Aviation Office Mascot, NSW
 Newcastle Office
 Canberra Office
 Melbourne Office
 Brisbane Office
 Perth Office
 Adelaide Office

PEOPLE

We have **2,966** employees.

Our employees are made up of the following:

2,382 male employees,
584 female employees, and
21 Indigenous employees.



Physical Security

Our physical security services include:

- Enforcement services
- Integrated operations centre
- Security guards and/or officers
- K9 services
- Access control
- Australian Government Security Cleared Officers
- Rail Industry Worker Trained Security Guards



Aviation Security Services

Our aviation services throughout 8 Australian Airports include:

- Aviation screening
- Checked baggage screening
- Perimeter security patrol
- Anti-touting enforcement
- Traffic enforcement
- Airport pass issuance
- Customer greeting & queue management
- Landside concierge coordination, taxis, hire cars, foot pedestrians
- Work Safety Officers, landslide & airside



Traffic Management

Our traffic management services include:

- Airport kerb-side traffic management
- Road works traffic management
- Event security patrol and crowd control



Work Safety Officers

Our work safety officers will, in accordance with aviation security requirements, conduct:

- Work Safety functions
- Worksite supervision
- Vehicle escorting



Mobile Patrols

Our mobile security patrol services and patrol guards include:

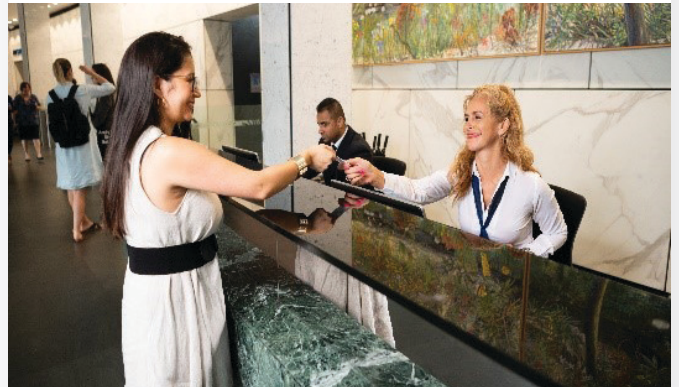
- Perimeter patrols
- Site inspections
- Alarm response
- Emergency response
- Patrol vehicles



Concierge & Customer Service

Our concierge & customer service solutions include:

- Corporate reception duties
- Meeting and greeting customers
- Signing in and escorting visitors
- Administration assistance
- Booking meeting rooms
- Allocating visitor parking



Screening services

Our screening services include:

- Baggage screening
- Passenger screening
- Mall room screening
- Freight screening
- Cargo examination screening



Temperature Testing

We provide security services together with products to help measure the temperature of your staff and visitors to reduce the risk of spreading COVID-19.

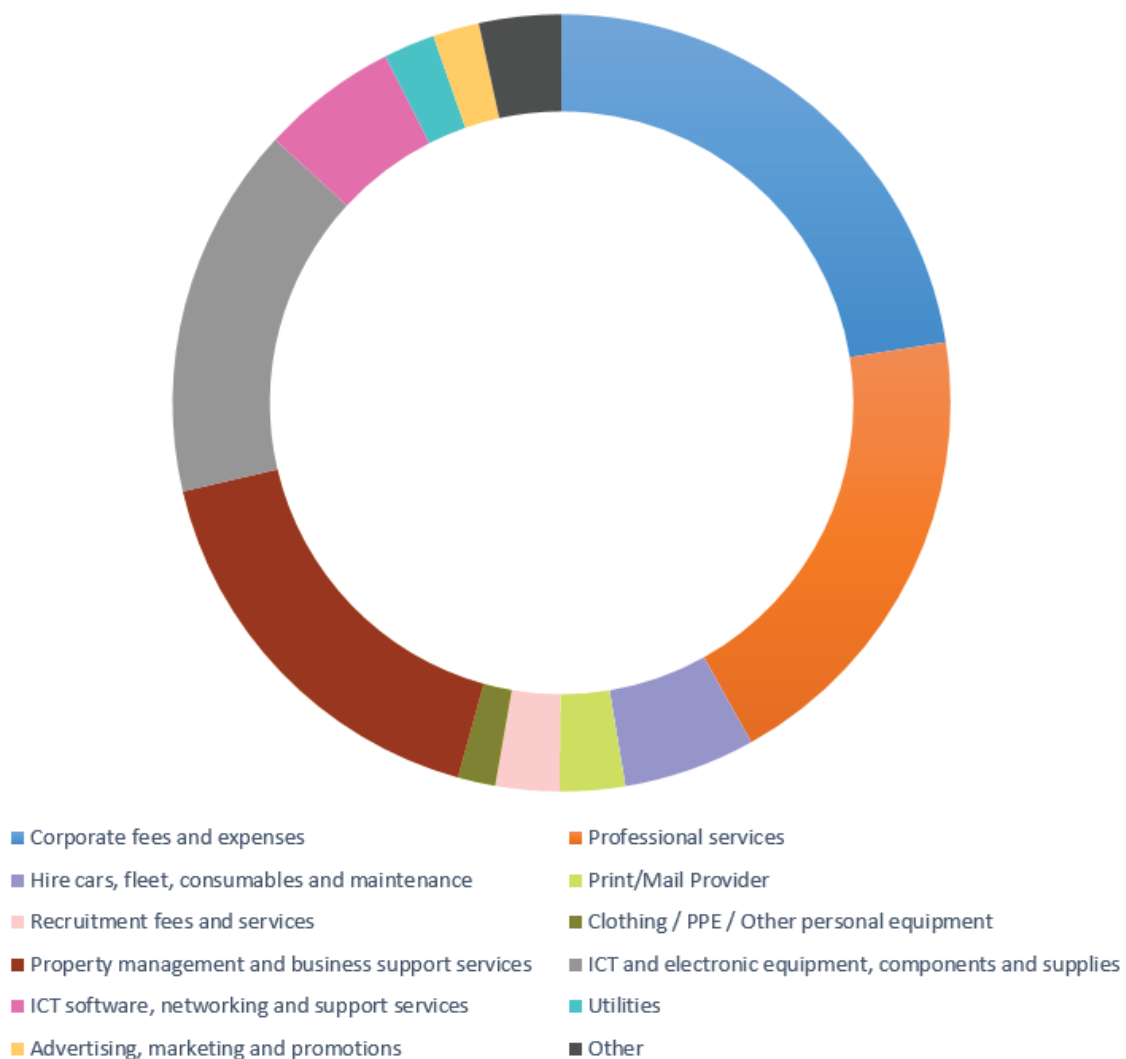
Our Supply Chain

Certis Australia's Tier 1 suppliers and subcontractors are predominantly located in Australia, with 96% located in Australia and 4% in other countries.

The main categories of goods and services we procure include corporate fees and expenses; property management and business support services; ICT and electronic equipment, components and supplies; fleet and hire vehicles, consumables and maintenance; professional services; ICT software, networking and support services; print and mailing; utilities; recruitment fees and services; uniforms and PPE; property maintenance services; and office and building supplies and services.

While we acknowledge that modern slavery occurs in Australia and that our local supply chain may still be vulnerable, we recognise that a higher level of risk will be found in lower tiers of our supply chain. We will start mapping our extended supply chain and identifying potentially high risk Tier 2 suppliers from 2022 onwards. An important part of this process is to ensure our direct suppliers are informed, educated and engaged to support us with this task. Engaging our direct suppliers has been an important focus in this reporting year.

2021 Spend Category - Suppliers



SPEND CATEGORY FOR SUPPLIERS – COMPARISON OF FY20 TO FY21

In 2021 we analysed our spend categories for FY21 and compared the spend to FY20. The notable changes to the spend categories was an increase in expenditure for ‘Professional services’ and ‘Clothing, PPE, and other personal equipment’, and a decrease in expenditure for ‘Property management and business support services’ and ‘Hire cars, fleet, consumables and maintenance’.

Rank	Rank ↑ or ↓	Spend Category	2020		2021	
			% Total Spend	Potential Risk	% Total Spend	Potential Risk
1	↔	Corporate fees and expenses	22.6%	Low	22.5% ↓	Low
2	↑	Professional services	10.0%	Low	19.4% ↑	Low
3	↓	Property management and business support services	20.4%	Medium	17.0% ↓	Medium
4	↔	ICT and electronic equipment, components and supplies	15.3%	High	15.5% ↑	High
5	↑	ICT software, networking and support services	4.1%	Medium	5.7% ↑	Medium
6	↓	Hire cars, fleet, consumables and maintenance	14.0%	Medium	5.5% ↓	Medium
7	↔	Print/Mail Provider	2.6%	Medium	2.7% ↑	Medium
8	↔	Recruitment fees and services	2.5%	Medium	2.6% ↑	Medium
9	↔	Utilities	2.5%	Medium	2.1% ↓	Medium
10	↔	Advertising, marketing and promotions	1.7%	Medium	1.9% ↑	Medium
11	↔	Clothing / PPE / Other personal equipment	1.1%	High	1.6% ↑	High
-	↔	Other	3.3%	-	3.4% ↑	-

Reporting Criteria 3: Modern slavery risks in operations and supply chain

Our modern slavery gap analysis and action plan developed in 2020 continued to inform our modern slavery risk management program. While we made some progress in assessing and addressing our operational and supply chain modern slavery risks, the impact of COVID-19 on our business meant that some of our planned risk management initiatives were put on hold as we focused on business priorities and protecting our workers.

While we are confident that we do not directly cause modern slavery through our own operations, we acknowledge the possibility that we may inadvertently contribute to, or be directly linked to, situations of worker exploitation or modern slavery through our extended supply chains and subcontracting arrangements. Our supplier and subcontractor due diligence processes are described in this section and Criteria 4 – Actions Taken.

Operational Risks

Our 2020 modern slavery operational gap analysis remained relevant in this reporting period and clearly documents our operational gaps and risks. The outcomes of the gap analysis were reported in our 2020 statement.

In 2021, we continued to review and update key internal policies and procedures to ensure modern slavery risk management is effectively integrated into business decision-making. We also conducted additional due diligence on our security subcontractors to ensure our modern slavery risks are effectively identified and managed. (see Criteria 4 – Actions Taken).

Supply Chain Risks

In FY21 an internal working group supported by external experts analysed approximately \$25 million of procurement spend for potential modern slavery risk. Four key risk factors were used to assess supplier risk:

- **Industry sector** – Specific industry sectors (for example manufacturing, services, agriculture etc.) deemed as high risk in international and national guidance documentation.
- **Commodity/product** – Specific products and commodities deemed as high risk by the US Department of Labor’s 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.
- **Geographic location** – Based on estimated in-country prevalence of modern slavery determined by a custom risk index developed by the external experts engaged to support our program. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of suppliers’ headquarters which may have elevated risk of poor labour standards and modern slavery.
- **Workforce profile** – In undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable or migrant labour is used. We recognise that poor labour practices may be present in some parts of our sector and we are committed to conducting our business as a responsible and ethical member of our community.

High Level Findings

- Overall, there is a moderate level of potential modern slavery risk in Certis Australia’s supply chain.
- Potential risk by spend has remained stable since the 2020 modern slavery risk assessment.
- Approximately 20% (\$5 million) of total spend analysed is potentially high risk for modern slavery.
- One-quarter of Certis Australia’s suppliers (or 23 suppliers) are considered potentially high risk for modern slavery.
- Seven of the 18 spend categories analysed are considered potentially high risk for modern slavery.

Data at a Glance

CERTIS AUSTRALIA GROUP

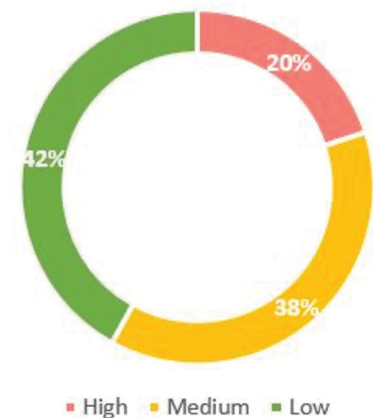
Total Spend:	\$25,169,427
Total Suppliers:	199
Supplier Spend range analysed (largest to smallest):	\$3M - \$18,000
Number of spend categories (goods and services):	18
Category spend range (largest to smallest):	\$5.6M - \$21,000

Important Notes:

1. As for our last statement, our focus in FY21 has been on Tier 1 suppliers with spend greater than \$18,000. We recognise that there may be significant risk amongst our smaller suppliers and will incorporate these into future risk assessments.
2. Security subcontractors were analysed separately and informed our subcontractor due diligence approach in FY21.

Risk by Spend

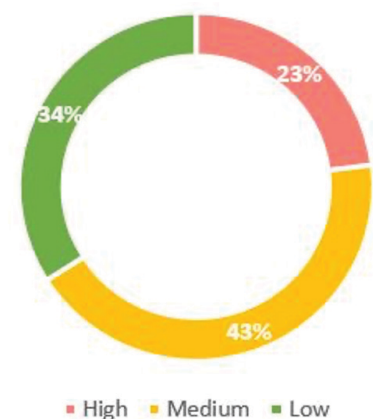
Analysis of \$25.2M of spend across Certis Australia entities covered by this statement indicates that 20% of spend is potentially high risk for modern slavery. Based on levels of risk reported in publicly available modern slavery statements by other corporate entities listed on the Commonwealth Government’s Modern Slavery Statement Register this could be considered a moderate level of risk.



Risk by Supplier

Analysis of higher spend suppliers (see ‘Notes’ above) indicates that 23 suppliers or approximately one quarter of the 99 suppliers analysed are potentially high risk for modern slavery with a further 42 (or 43%) considered to present medium-level risk.

Three-quarters, or 18 of the 23 potentially high-risk suppliers were also identified in our FY20 supplier analysis. Identifying



and working closely with these year-on-year suppliers increases the impact of our efforts to manage risk in our supply chain. We will focus our due diligence efforts initially on potentially high-risk suppliers with whom we have established longer term relationships.

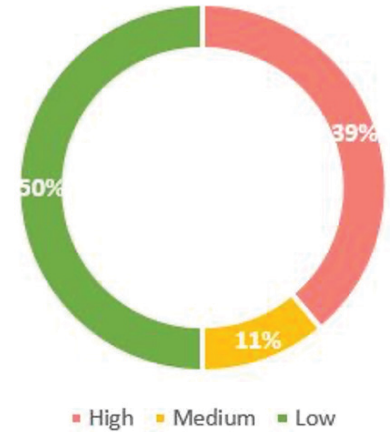
Risk by Spend Category

Based on the four risk factors outlined above, we consider seven of our 18 spend categories to be higher risk for modern slavery.

Our highest risk procurement categories are:

- ICT, electronics and communications equipment;
- Clothing, Personal Protective Equipment (PPE) and other personal equipment;
- Property and facility maintenance services (e.g. maintenance and cleaning);
- Office and building supplies and services;
- Employee incentive schemes (gifts, merchandise etc);
- Merchandise and promotional products; and
- Travel, accommodation and parking.

Property management and business support services are our largest medium risk spend category and consists of spend with national airports on goods and services such as rent, parking, security checks and passes, and utilities such as energy, water and waste management.



Reporting Criteria 4: Actions taken to assess and address risk

Our 2020 modern slavery gap analysis informed the development of our modern slavery action plan and three-year road map. The action plan continues to drive our modern slavery risk management program and is regularly reviewed and updated by our modern slavery working group. The following actions were completed in this reporting period:



Board and Executive Engagement

Our Board and executive leadership team remains engaged and supportive of our modern slavery risk management initiatives. Regular updates are provided to the Group Executive Committee through our monthly reporting framework. Our Modern Slavery Statement is reviewed and discussed at Board level and signed off by the Board prior to publication.



Responsibilities for Modern Slavery

Our Modern Slavery Working Group formalised and documented key roles and responsibilities for modern slavery risk management. Certis' Australian-based Head of Compliance and QMS has overall responsibility for the implementation and review of our program and together with her team ensures relevant sections of the organisation are engaged and informed of new systems and processes for managing our risks. In 2022 we will develop KPIs for modern slavery risk management across relevant positions and integrate this into performance reviews as relevant.



Risk Framework

Our Australian-based Risk Group expanded local risk registers to capture different types of risks, including modern slavery and human rights risks. Monthly reports are prepared against key risk indicators, with reports submitted to Group Risk in Singapore and ultimately to our Board. During 2020, the modern slavery risk register was developed and reviewed internally. It is expected that monthly reporting will commence against modern slavery risk indicators during the next reporting period.



Modern Slavery Policy

We developed a stand-alone Modern Slavery Policy which we communicated to selected staff in 2020. A key project this year has been transitioning from our outdated document portal to a new purpose-built QMS and document library. The new system will ensure staff can read and sign-off on documents online and that important policy and other documentation is readily available to office and field staff.

Modern Slavery Policy Case Study

Following a review of existing policies, it was determined that Certis required a stand-alone modern slavery policy which was subsequently developed collaboratively with working group members representing a cross-section of the business and ratified by the

Senior Leadership team. The policy was implemented and disseminated to all corporate staff via the company's cloud-based document management system within the FY21 reporting period.

It is expected that during the FY22 reporting period the documentation will be disseminated via a purpose built document dissemination platform which will better promote the policy and result in increased understanding among office and field staff.



Education and Training

In 2020 we completed a Training Needs Analysis and mapped modern slavery knowledge requirements against key positions within the company. We purchased an initial three targeted 10-minute modern slavery eLearning modules for our senior managers, state managers and branch managers. Staff and subcontractors will undertake the training in late 2021, and an additional three modern slavery eLearning modules will be procured to expand our company's knowledge base in early 2022.

Training Case Study

In the FY21 period, Certis undertook a detailed Training Needs Analysis to identify modern slavery training requirements across its workforce.

In response to the findings of this analysis, Certis researched off-the-shelf training modules, identifying a suite of modern slavery specific training modules that could be tailored to our business' requirements.

Key executives across Certis have completed the first three training modules with a planned roll out of modules to remaining executives, senior management, relevant staff, as well as subcontractors planned for the FY22 reporting period. This training will be implemented via the company's cloud enabled Learning Management System.

The Certis Learning Management System (LMS) is one of the principal tools utilised to educate our people and delivers any-device, anytime, anyplace functionality. Advanced reporting capabilities ensures that none of our team-members miss critical information and allows the management team to conduct thorough training gap analysis activities to ensure that appropriate training is identified and completed as required.

A training evaluation and effectiveness plan will be developed in the FY22 reporting period to analyse the outcomes of training provided across the business.



Procurement Policy and Supplier Procedures

With the support of external consultants, we reviewed and updated our Procurement Policy to ensure human rights, labour rights and environmental sustainability risks and impacts are considered in our procurement processes. This includes a commitment to better understanding our procurement profile and having a pragmatic yet effective governance framework to support and manage it. Our updated policy clearly communicates our commitment to identifying and managing human rights and labour rights risks in all

procurement contracts and transactions; and working with our suppliers to identify and mitigate risks through the use of audits and implementation of corrective action plans where required. Through our updated Procurement Policy we have more clearly defined the responsibilities and accountabilities for our procurement activities and ensuring any risks are identified and managed throughout the procurement cycle.



Subcontractor Due Diligence

In FY20 we continued to engage subcontractors to support our workforce of direct employees. Our selection process is segregated from our operational management teams. Any such engagement is processed by the Compliance Team who exercise due diligence to assess potential subcontractors, to enable an independent and informed decision to be made. If we proceed with engaging the subcontractor, we apply various monitoring processes such as security licence verification of their staff against the public register, electronic time and attendance with biometric verification of all staff for guard shifts, oversight of rosters and fatigue indicators, as well as audits of our key subcontractors.

Case study - Assurance that we know who is working, where and when

During FY20 Certis carried out further development and wider implementation of its in-house Business Operations Support System, or BOSS application. This technology platform delivers real-time reporting of time and attendance, incidents, safety hazards, welfare checking configured on a risk-based approach to confirm staff are okay at pre-determined intervals, and other functions to support field staff. The system is easily accessible by staff on various devices and improved functionality of the app means it is also more accessible on mobile phones. Our operational management team spent months in the field educating staff on how to access and use the system.

Throughout FY21 we have made enhancements to the BOSS interface with our staff database and rostering system, to ensure the delivery of services remains compliant with legal and regulatory requirements, as well as the standards set by our business. It provides assurance that we have current information on hand for all guards, including security licensing and training qualifications. The system cross-references data from the security licensing public registers of the various States and Territories to confirm the validity of licences. This provides us with assurance that each guard has met the eligibility requirements to hold a security licence, including training, criminal history, work rights, and at least 18 years of age.

When checking into a shift, the system uses facial verification to automatically check and verify the identity of the guard. The check in and out of shifts is captured in real-time with geolocation data, providing assurance as to who is working, where, and when. Certis uses this data to perform checks and balances to identify and manage risks including those associated with modern slavery and worker exploitation, such as fatigue indicators.

Although COVID-19 restrictions limited our ability to conduct onsite audits of our subcontractors, we conducted virtual audits using online meeting platforms. At first, this process proved challenging for both our staff and subcontractors. As a result, we reviewed our

auditing process and committed additional resources to building our internal audit capability. We will also be expanding our question set and evidence collection processes to ensure modern slavery and worker exploitation risk factors are effectively assessed and addressed. This will include more comprehensive visa checks of temporary migrant workers, hours worked and pay rates. Comprehensive corrective action plans will be developed for partial-compliances and non-compliances and results of the process will be included in our reports to Group Risk.

Our updated Subcontractor Evaluation Procedure ensures our subcontractors requiring evaluation are selected by our Compliance Team using a risk-based approach. Around 15 – 20 subcontractors are assessed annually, scored, and ranked according to performance and risks posed. This includes evaluating risk of worker exploitation and modern slavery.

Subcontractor Due Diligence Case Study

A total of twenty (20) subcontractor audits were conducted by Certis during the reporting period. These subcontractors accounted for 63% of spend on all subcontractors used in FY21.

From March 2020, the coronavirus pandemic presented a challenge to the audit team however they quickly transitioned from the traditional face-to-face audit program to remote auditing utilising online collaboration applications such as Microsoft Teams.

Each audit encompassed the following areas:

- Security and other industry licensing;
- Insurances and certifications;
- Company and business registrations, structure and ownership;
- Human resources, payroll records and work rights (including VEVO checks); and
- Worker health and safety.

Through our evidence-based auditing program it was found that a vast majority of subcontractors were in compliance with their legislative and contractual obligations.

Opportunities for improvement were identified in some areas, including formalising WHS processes and enhancing policies and procedures in this area. We also recommended that more robust work rights checking processes be implemented, such as increasing the frequency and breadth of VEVO checks by subcontractors.

An additional nine subcontractor audits have been scheduled for early to mid-2021 to ensure that subcontractors comprising more than 80% of our annual subcontractor spend are audited on a one-to-three year cycle.

Three-Year Road Map

YEAR 1 APRIL 2019 – MARCH 2020 Establish Framework	YEAR 2 APRIL 2020 – MARCH 2021 Implement Priority Actions	YEAR 3 APRIL 2021 – MARCH 2022 Review, Extend, Evaluate & Improve
Gap analysis completed.	Expanded risk framework and further mapped operations against potential risk of modern slavery.	Map modern slavery risks and vulnerabilities along extended supply chain.
Action plan and three-year roadmap developed.	Documented responsibilities for managing modern slavery risks across the organisation.	Develop procedures to effectively respond where modern slavery risks are identified.
Working Group established.	Reviewed existing procurement policies and procedures for alignment with modern slavery legislative reporting requirements.	Incorporate performance standards and contract evaluation criteria for high-risk contracts.
Board and Senior Leadership Team engaged.	Educated senior management on modern slavery risks and legislative requirements.	Review compliance with contract clauses and work with subcontractors to address non-compliance.
Tier 1 suppliers identified and prioritised according to modern slavery risk.	Undertook risk prioritisation of subcontractors.	Establish supplier monitoring program.
Draft Modern Slavery Policy developed.	Promoted/communicated modern slavery policy internally.	Develop modern slavery supplier engagement strategy.
	Created modern slavery awareness training program for staff and subcontractors.	Desk-top assessment and SAQ with two priority potentially high risk suppliers, who together account for 50% of our FY20 high risk spend.
		Develop corrective action plans with highest risk suppliers.
		Expand the Whistleblower Policy and process to include modern slavery response mechanisms. Review the effectiveness of whistleblower mechanism against UN Guiding Principles.

Reporting Criteria 5: Effectiveness Assessment

Our modern slavery risk management action plan and due diligence processes are evaluated as part of our regular compliance reviews. The Compliance Team monitor the modern slavery program initiatives and plans, with progress reported to the Senior Leadership Team annually for consultation and review.

Our Risk Assurance Framework includes the following components:



Compliance Team

The Compliance Team oversees the Modern Slavery Program for Certis Australia. This is the first line of defence for managing the program including the risk management initiatives and plans. Key risk indicators are identified through the risk management initiatives and reported monthly through the risk management framework.



Group Risk Committee

The Group Risk Committee forms the second line of defence, is an independent and centralised function responsible for analysing, assessing, and managing risk across Certis. This Group design and oversee the implementation of the risk management framework. All material risk is monitored by the Group Risk Committee.



Group Internal Audit

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

In 2021 we assessed the effectiveness of our actions against the following key indicators:

Focus Area	Example Activity	Effectiveness Assessment
Risk and governance	Board and Executive engagement. Modern Slavery Policy. Updated Risk Framework.	Regular oversight on progress against modern slavery risk management plan by Compliance Team. Monthly reporting to executive and board committees.
Procurement & Supply Chain	Supplier risk prioritisation. Supplier engagement.	Ongoing due diligence of Tier 1 suppliers and deeper understanding of modern slavery risks in supply chain. Planned integration of modern slavery risk management into procurement processes and BAU.
Subcontractor Due Diligence	Subcontractor spend and risk prioritisation. Subcontractor engagement. Subcontractor audits.	Enhanced awareness of the issue among subcontractors. Ongoing improvements in subcontractor processes to manage risks associated with labour hire recruitment.
Awareness and Training	Training Needs Analysis. eLearning module delivery. Awareness raising comms.	Increased awareness of modern slavery risks and mitigation actions among key staff, managers and executive.
Grievance and Reporting	Reviewed the Whistleblower Policy.	Number of modern slavery or worker exploitation grievances received by Certis.

Reporting Criteria 6: Process of consultation with entities owned or controlled

The Certis Australia entities share the same Senior Leadership Team. As a member of the Senior Leadership Team, the Head of Compliance oversees the Modern Slavery Program for Certis Australia.

The Head of Compliance briefs the Senior Leadership Team on the progress of the Modern Slavery Program initiatives, plans, and the effectiveness of our program. This information is then cascaded through the Australian entities by the other members of the Senior Leadership Team.

Reporting Criteria 7: Other

We acknowledge the importance of raising awareness and influencing others to drive positive change and ensure modern slavery risks are effectively managed and mitigated. Certis is a member of several organisations and actively participates in industry groups that provide a forum to raise and debate important issues such as modern slavery and worker exploitation.

One such organisation is the Australian Security Industry Association Limited (ASIAL). It is the peak body for security organisations and professionals in Australia, and we have been a member since it was established in 1969. ASIAL members account for approximately 85 percent of the Australian security industry, comprising small, medium and large operations. Through the compliance section of our business, we have been a member of ASIAL special interest groups since 2015 including protective services, electronics, human resources and industrial relations. We attend industry briefings, conferences, and other events. Through these forums, we help raise awareness about practices in our industry sector and elsewhere that may contribute to modern slavery and worker exploitation.

Our Approvals

This statement was approved by the board of directors of Certis Australia Pty Ltd on 30 September 2021.



Tom Roche
Chief Executive, Australia

CERTIS 
SECURITY