



Modern Slavery Statement 2024

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, and Sydney Night Patrol & Inquiry Co Pty Ltd. These entities will be referred to in this Statement hereafter as “Certis Australia” or “the company”.

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 Ltd
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



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About Us

Certis Australia is a unique blend of people, cultures and expertise that make us who we are today. Our combined local and global experience dates back almost 100 years, and we are proud to reflect our history in our modern approach.

Backed by over 60 years of rich history in physical security and patented innovation in Singapore, we have grown from a security guard and escort unit to become a leading integrated security services provider for businesses around the globe – including in Australia. Integrating technology with our security services, Certis anticipates problems and provides innovative solutions tailored to any industry.

Certis Australia is pleased to publish our fifth Modern Slavery Statement for the reporting period FY2024.

2024 Modern Slavery Risk Management Initiatives

In FY24 we continued to raise awareness about modern slavery risks among our employees, suppliers and contractors. Our Modern Slavery Working Group (referred to as the 'Working Group') re-did our gap analysis and prepared a new action plan and three-year road map for the period 2025 to 2027. External subject matter experts were engaged to prioritise our direct suppliers according to potential modern slavery risk to ensure due diligence focuses on the highest risk suppliers and supply categories. Desk-top modern slavery risk assessments were conducted with two suppliers in high risk spend categories (garment manufacture and electronic equipment supply) and we continued to work with these suppliers to ensure corrective action plans were implemented. Working with priority Tier 1 suppliers has enabled us to identify several potentially high-risk Tier 2 suppliers.

Our Plans for 2025

In 2025 our Working Group will review, extend, evaluate and improve our modern slavery risk management program, ensuring it reflects any updates to the Commonwealth legislation. Our priority will be to establish performance standards and evaluation criteria for executive managers, suppliers and contractors and support key suppliers to implement corrective action plans that strive for continuous improvement. We will also work more closely with our lower spend suppliers to provide resources and support enabling them to better manage modern slavery risks in their operations and supply chains. Given the success of our modern slavery training program, we will expand this further to train staff and management on evolving threats and opportunities, grievance mechanisms and effective modern slavery remedy processes.

Our Plans Beyond 2025

Beyond 2025 we will build on the actions undertaken to ensure a continuous improvement approach to modern slavery risk management in a way that reflects leading practice in the security industry sector. Engaging and educating the company's potentially highest risk and highest spend suppliers, along with subcontractors remains a priority as is supporting smaller suppliers in risk mitigation initiatives. To this end, we will continue to work with suppliers, distribute guidance for SMEs and provide advice and support where we can.

A Brief Statement from Brett Pickens, Chief Executive, Australia



Certis Australia stands against any form of slavery. We are committed to enhancing our understanding of human rights and modern slavery risks and taking action to manage, mitigate and prevent impacts on people touched by our company activities. Our goal is to ensure that modern slavery does not exist within our business or supply chain, as we pride ourselves as a business that respects people and human rights.

Our 2024 Statement summarises steps we have taken to refine and expand our modern slavery risk management and due diligence processes. We repeated a Modern Slavery Gap Analysis undertaken in 2019 which showed significant improvement in managing risk in a number of the business areas analysed. Informed by the results of the Gap Analysis, our Modern Slavery Working Group updated and refined our Modern Slavery Action Plan and three-year Road Map.

Assessment of potential risk among our direct suppliers suggests that our risk profile remains largely unchanged from previous reporting periods. We continued to engage our highest spend and potentially highest risk suppliers in a modern slavery self-assessment questionnaire, provided them practical improvement recommendations and reviewed actions they have taken to manage risk. We continue to work closely with these suppliers to ensure corrective actions are implemented so that together we can better manage our collective modern slavery risk.

This Modern Slavery Statement builds on our previous four Statements and highlights actions we have taken in the FY24 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 (Cth).

This statement was approved by the Certis Australia Board on 30 September 2024.

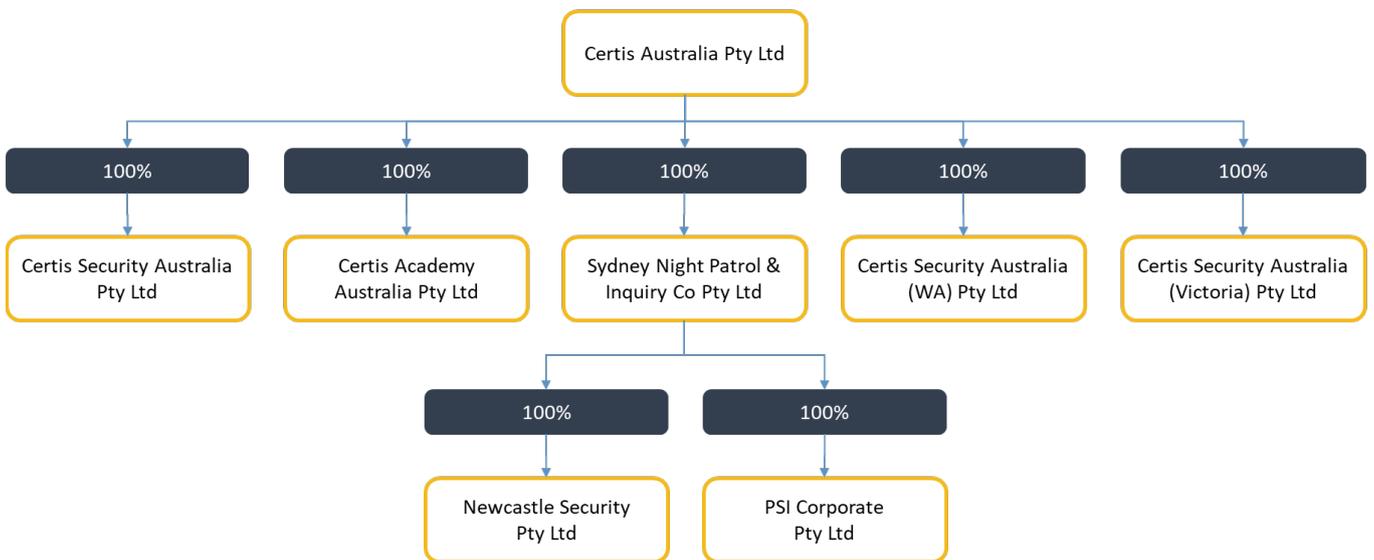
Reporting Criteria 1 & 2: Structure, Operations and Supply Chain

Our Organisational Structure

Certis Australia Pty Ltd is the holding company and 100% owner of Certis Academy Pty Ltd, Certis Security Australia 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.

Certis Group Structure - Australia



Supporting Other Organisations

The Corroboree Group was formed in 2015 to provide opportunities and career pathways for Indigenous communities in the ACT and wider region. It is a not-for-profit organisation with 60% Indigenous ownership.

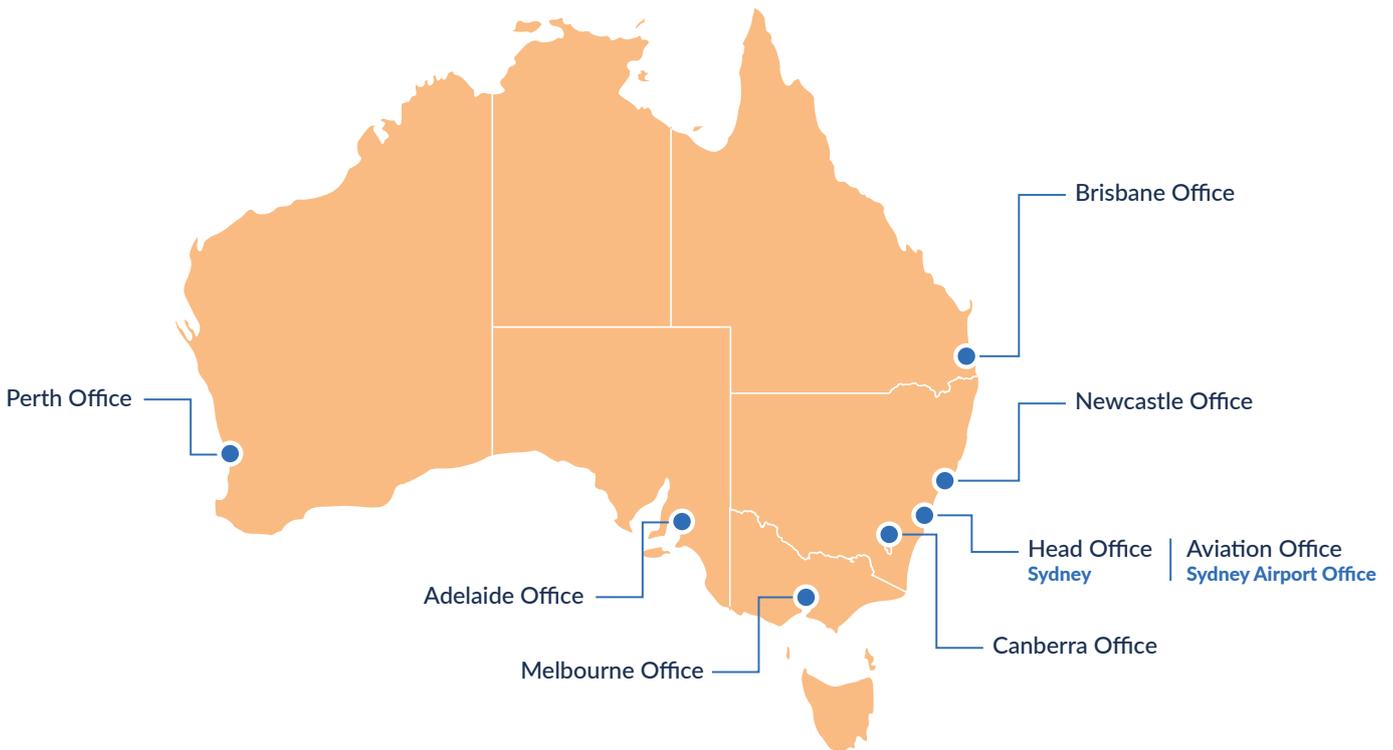
In consultation with Certis Australia, Corroboree Group formed an entity called Corroboree Certis Pty Ltd (Corroboree Certis). Certis Australia provides administrative services to support Corroboree Certis in providing services to its clients.

Certis Australia supports Corroboree Certis through the provision of administrative supporting including:

- access to our 24/7 National Operations Centre;
- support from our ACT State Office & Operational Infrastructure; and
- utilisation of Certis Technology infrastructure.



Our Operations



Certis Australia is headquartered in Sydney, with state and regional offices across the country in Brisbane, Newcastle, Canberra, Melbourne, Adelaide, and Perth. Certis Group is headquartered in Singapore, with an international presence that extends to Hong Kong, Macau, China and Qatar.

People

We have
3,344
employees.



909 Female Employees
(Including 8 female indigenous employees)



2,435 Male Employees
(Including 12 male 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 6 Australian Airports include:

- Aviation screening
- Checked baggage screening
- Perimeter security patrol
- Anti-touting enforcement
- Traffic enforcement
- Airport pass issuance
- Customer greeting & queue management
- Landslide 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, for example to help measure the temperature of your staff and visitors to reduce the risk of spreading COVID-19.

Our Supply Chain

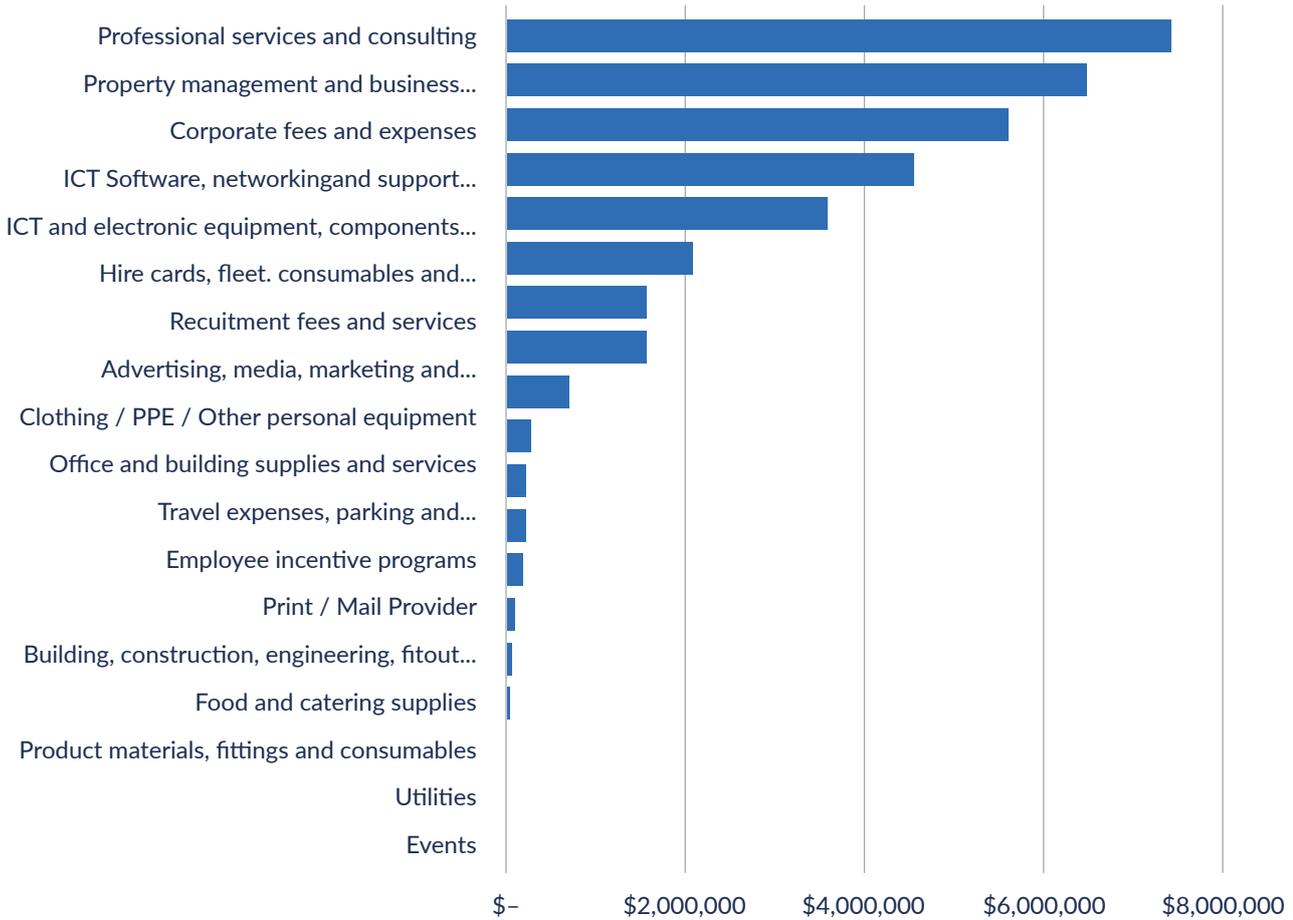
Certis Australia spent a total of \$34.8 million with 144 suppliers of goods and services with spend greater the \$18,000 per supplier in FY24. This figure does not include spend on our resource contractors (subcontractors) that deliver security services on our behalf. Analysis of our subcontractors was undertaken in FY23 and will be redone in FY25 (See case study page 15 of our FY2023 Statement).

Ninety-eight per cent (98%) of our spend with Tier 1 suppliers is with suppliers located in Australia. The remaining spend is with suppliers in Ireland, Singapore, the United Kingdom and the United States.

The main categories of goods and services we procure are consistent year on year and include the following:

Rank	+/-	Spend Category	2023		2024	
			% Total Spend	Risk	% Total Spend	Risk
1	↑	Professional services and consulting	21%	Low	21% ↔	Low
2	↑	Property management and business support services	13%	Medium	19% ↑	Medium
3	↓	Corporate fees and expenses	22%	Low	16% ↓	Low
4	↑	ICT- software, networking, and support services	6%	Medium	13% ↑	Medium
5	↓	ICT and electronic equipment, components, and supplies	13%	High	10% ↓	High
6	↓	Clothing, PPE, and personal equipment	2%	High	10% ↓	High
7	↔	Hire cars, fleet, consumables, and maintenance	5%	Medium	6% ↑	Medium
8	↑	Property and facility management services	Not in top 10		4% ↑	High
9	↓	Recruitment fees and services	4%	Medium	4% ↔	Medium
10	↑	Advertising, media, marketing and promotions	Not in top 10		1% ↑	Medium
		Other	6%		5%	

Figure 1: Spend by Procurement Category (\$)



We acknowledge that modern slavery occurs in Australia (the Global Slavery Index 2022 estimates 41,000 people live and work in conditions of modern slavery in Australia) and that our local supply chain may be vulnerable. We recognise, however, that a higher level of risk will be found in the lower tiers of our supply chain. To that end, we continue the work started in 2022 and 2023 to map our extended supply chain and identify potentially high-risk suppliers and supply categories in our Tier 2 supply chain (see also Case Study 2 in Certis Australia Modern Slavery Statement 2022).

Ensuring our direct suppliers are informed, educated and engaged to support us with this task continues to be an important focus of our modern slavery risk management activities.

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

Our modern slavery gap analysis and action plan, developed in 2019 to inform our modern slavery risk management program, was updated in this reporting period. We have continued to improve our capability to assess and address our operational and supply chain modern slavery risks.

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

Operational Risks

With the support of external experts, we repeated the modern slavery Gap Analysis first undertaken in 2019 (refer Certis Modern Slavery Statement FY2020, page 12). Members of our Modern Slavery Working Group attended, representing legal and compliance, risk, quality assurance, sales and marketing, human resources and procurement from across our Australian operations and Singapore based head office. Repeating the workshop enabled the Working Group to:

- Assess overall progress made implementing our risk management program since the initial workshop;
- Identify gaps or opportunities within each of the five business areas assessed in the analysis;
- Inform and recalibrate our Modern Slavery Roadmap and accompanying action plan; and
- Report our modern slavery governance maturity to our Executive and Board.

Building on the due diligence undertaken by our Compliance Team of our security subcontractors in previous reporting periods, we conducted additional audits to ensure our modern slavery risks are effectively identified and managed. We also reviewed and enhanced our employment and payroll auditing processes of subcontractors which enabled us to introduce more detailed compliance reviews (see also Criteria 4 and Case Study 2, page 19).

Supply Chain Risks

In FY24 we analysed approximately \$34 million of procurement spend for potential modern slavery risk and refreshed our supplier risk dashboard. Four key risk factors were used to assess suppliers for potential modern slavery 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 are 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 continues to be a moderate level of potential modern slavery risk in Certis Australia’s supply chain.
- Potential risk by spend has remained consistent with findings reported in previous modern slavery statements.
- Approximately 16% (\$5.4 million) of total spend was assessed as potentially high risk for modern slavery.
- Approximately one-quarter of Certis Australia’s suppliers (or 32 suppliers) are considered potentially high risk for modern slavery.
- Nine of the 19 spend categories analysed are considered potentially high risk for modern slavery.

Risk by Spend

Analysis of spend across entities covered by this statement indicates that 16% of total spend is potentially high risk for modern slavery. This is the same level of high-risk spend as reported in our 2023 Statement and aligns with findings from our statements published since 2020 (See Case Study 1, page 17).

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

Risk by Supplier

Analysis of higher spend suppliers indicates that 32 suppliers or just under one quarter (22%) of the 144 suppliers reviewed are potentially high risk for modern slavery, a slight decrease on figures reported in our 2023 Statement.

Forty-one percent of suppliers were considered to present medium-level risk and 37% were classified as low risk for modern slavery.

Risk by Procurement Category

Based on the four risk factors outlined above, we consider nearly half (47%) of our 19 spend categories to present higher risk for modern slavery.

Our top five 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)



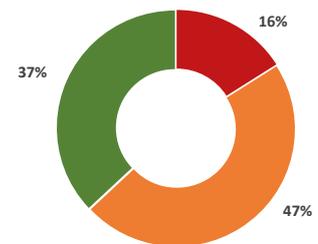
Office and building supplies and services



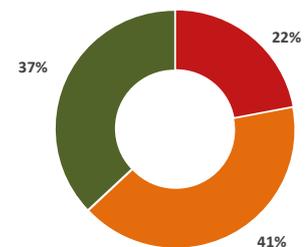
Employee incentive schemes (gifts, merchandise etc)

ICT, electronics and communications equipment remain our highest risk category making up two thirds (66%) of our high-risk spend. Property management and business support services are our largest medium risk spend category and consist 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.

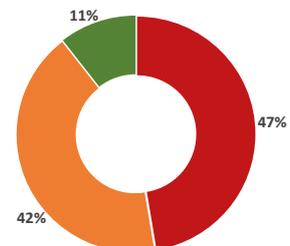
Risk by Spend %



Risk by Supplier %



Risk by Category %



Reporting Criteria 4: Actions taken to assess and address risk

Modern Slavery Gap Analysis

Our Working Group repeated the modern slavery gap analysis first undertaken 2019 to assess progress made in implementing risk management actions across five key categories:

- Management Systems,
- Human Resources and Recruitment,
- Procurement and Supply Chain,
- Risk Management, and
- Customers And Stakeholders.

Figure 2 provides the results of our second modern slavery gap analysis and indicates a change in governance maturity compared to our 2019 gap analysis outcomes.

Figure 2: Gap Analysis Results

Change from 2019

Management Systems					
Governance					No Change
Commitment					No Change
Business systems					No Change
Action					No Change
Monitoring/Reporting					No Change
Risk Management					
Risk Framework					Improved
Operational Risk					Improved
Identifying External Risk					Improved
Monitoring/Reporting					Improved
Supply Chain					
Policy/Procedures					Improved
Contract Management					Improved
Screening/Traceability					Improved
Supplier Engagement					Improved
Monitoring/Corrective Action					Improved
Customers/Stakeholders					
Customer Attitude					Improved
Information Provision					Improved
Feedback Mechanisms					Improved
Worker Voice					Improved
Human Resources					
Awareness					Improved
Policies and Systems					Improved
Training					Improved
Labour Hire					Improved



A comparison of results between 2019 and 2024 indicated a marked improvement in our modern slavery governance maturity and capacity to manage modern slavery risks. Improvements were identified in over 75% of the 22 categories of actions assessed:

- Actions in Risk Management, Supply Chain, Human Resources and Customers and Stakeholders categories all showed improvements;
- Our approach to incorporating modern slavery in Management Systems remained unchanged; and
- No categories of actions remained 'At the starting line' (Red) or had a reduced level of effectiveness from the previous assessment.

In 2019, our Working Group and representatives from key business units developed our first Modern Slavery Action Plan and Roadmap based on results from our initial gap analysis. Repeating the Gap Analysis in 2024 enabled us to update and refocus our three-year Roadmap providing a pathway to ensure modern slavery risks continue to be effectively assessed, addressed and mitigated across our operations and supply chain.



Responsibilities for Modern Slavery

Certis' Australian-based Head of Compliance has overall responsibility for the implementation and review of our modern slavery risk management program and together with her team ensures relevant sections of the organisation are engaged and informed of new systems and processes for managing our modern slavery risks. We plan to review existing KPIs and ensure modern slavery KPIs are integrated into relevant position descriptions in FY25.



Risk Framework

Our Australian-based Risk Group expanded our local risk registers to capture different types of risks, including modern slavery and human rights risks. Monthly reports are prepared locally against key risk indicators which is reported to our Executive Committee, Group Risk Committee and Internal Audit.



Modern Slavery Policy

Our stand-alone Modern Slavery Policy continues to drive our commitment and approach to modern slavery risk management. The Policy is accessible on Certis Docs (our document library) and made available to external stakeholders or other interested parties on request.



Supplier Spend and Risk Analysis

With the support of external consultants, we reviewed our procurement spend and refreshed our Tier 1 (direct) supplier risk dashboard. Findings of the assessment were consistent with findings in previous statements with little substantive change in our risk profile (see Case Study 1, page 17).



Enhanced Supplier Due Diligence

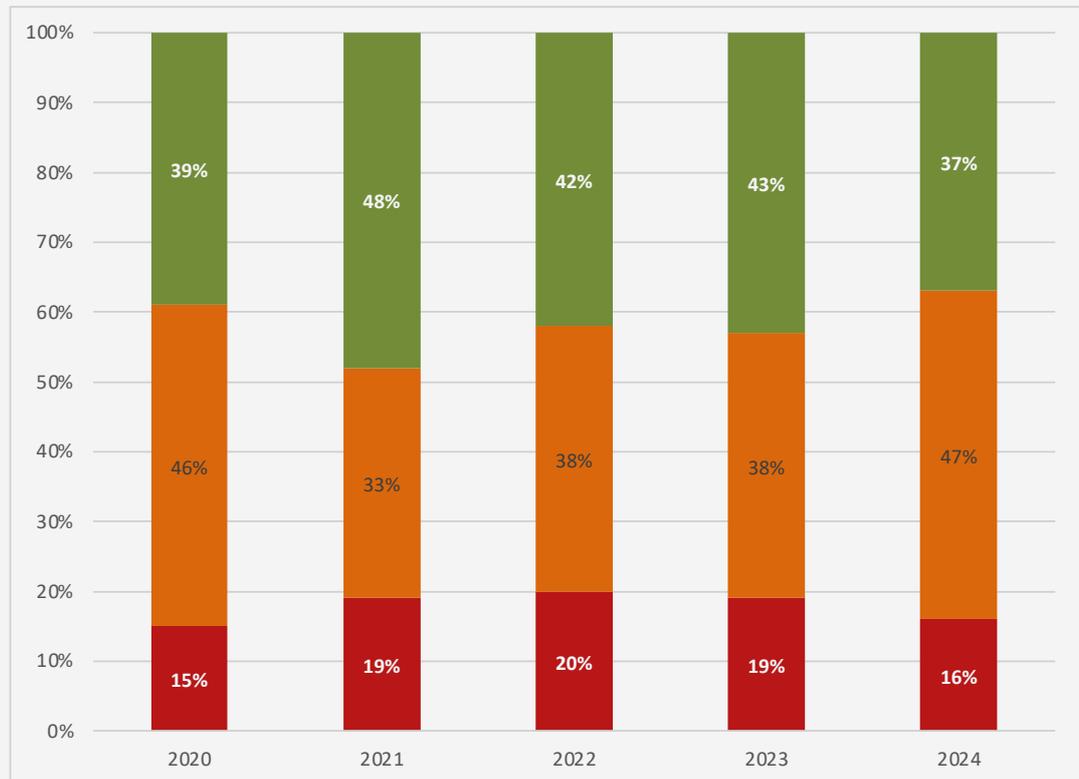
In FY24 we aimed to obtain a clearer understanding of the measures taken by our major 'potentially high risk' suppliers to manage modern slavery risk in their operations and supply chains. We worked with one of our highest potential risk suppliers identified in our 2022 supplier assessments to revisit their previous responses to our supplier survey and implement a corrective action plan with the support of an external adviser. While the supplier has systems and processes in place to assess, address and mitigate modern slavery risk, several recommendations were made, and a corrective action plan issued. We will continue to work with this supplier to ensure corrective actions are implemented as required.

Case Study 1: Assessing Year-on-Year Supply Chain Risk

FY2024 is our fifth year of reporting on our efforts to assess and address supply chain modern slavery risk. We continue to assess potential risk based on four key modern slavery risk indicators: geography; industry sector; commodity and workforce vulnerability (see page 14 for more information). To better understand evolving risk patterns and trends in our supply chain, we undertook a combined analysis of modern slavery risk assessments undertaken for five statements for the 2020 to 2024 reporting periods.

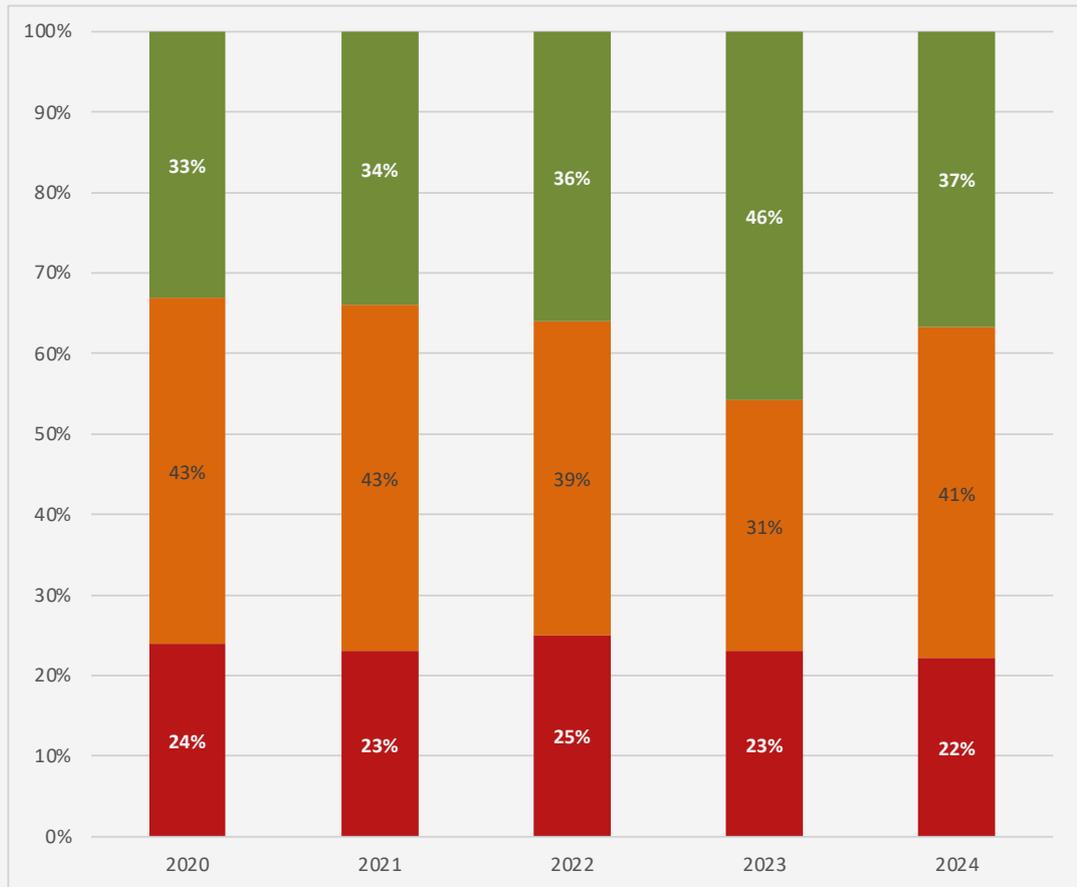
A total of \$151 million of spend on goods and services (excluding resource contractors) between the 2020 to 2024 reporting periods was analysed. Patterns of potential risk associated with our total annual spend are relatively stable and are consistent over the five reporting years (Figure 3), with high risk spend fluctuating between 15% to 20% of total annual spend, with no significant trend apparent over the period assessed. Patterns of medium and low risk showed similar minor fluctuations.

Figure 3: Risk by Spend 2020-2024



Two hundred suppliers of goods and services (excluding subcontractors) have been prioritised against potential risk indicators. The percentage of potentially high risk suppliers has remained largely consistent across the five reporting periods, with between 23% to 25% of suppliers being assessed as high risk for modern slavery (Figure 4). Numbers of medium and low risk suppliers have also remained consistent between reporting periods.

Figure 4: Risk by Supplier 2020-2024



Risk associated with specific goods and services procured remained constant over the five reporting periods. ICT and electronic equipment were the highest risk and highest spending category. Property and facility maintenance services and Clothing, PPE, and other personal equipment were the second and third highest risk categories from 2020 to 2024.



Subcontractor Due Diligence

Our Compliance Team continued to assess new subcontractors and carry out compliance reviews (audits) of existing subcontractors that support our workforce of direct employees. The selection process for subcontractor audits is administered by our Compliance Team independent of the operations using a risk-based approach. This includes evaluating risk of worker exploitation and modern slavery.

The following categories were reviewed in subcontractor audits:

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

Comprehensive corrective action plans were developed for partial compliances and non-compliances.

Case Study 2: Subcontractor Due Diligence Case Study

Twenty-one (21) subcontractor audits were conducted by Certis during the reporting period. These subcontractors account for about 50% of subcontractor spend.

Our evidence-based auditing program identified that the majority of the subcontractors are complying with their legislative and contractual obligations. High levels of compliance were observed in the following areas:

- subcontractor staff are aware of their employment and labour rights;
- pay slips and leave entitlements are documented and recorded; and
- regular checks of work rights are undertaken using VEVO.

We will continue to implement our due diligence program with an aim to ensure that subcontractors comprising more than 80% of our annual subcontractor spend are audited on a one-to-three-year cycle.

Modern Slavery Roadmap

Using the findings of the Gap Analysis, our Modern Slavery Working Group updated our modern Slavery Road Map for the next three years.

Area of Focus	FY2025	FY2026	FY2027
Governance & Due Diligence	<p>Continue to educate and engage Executive Committee and Senior Leadership Team on modern slavery compliance requirements and emerging risks and opportunities.</p> <p>Formalise responsibilities / accountabilities for managing risk into employee roles and position descriptions.</p>	<p>Establish Executive Committee level modern slavery targets and/ or KPIs.</p>	<p>Continue to review responsibilities and accountabilities to reflect increasing legislative requirements.</p>
Risk Management	<p>Formally incorporate modern slavery assessment into risk management framework (and board risk appetite statement).</p> <p>Undertake risk assessments of subcontracting arrangements.</p>	<p>Build on existing risk monitoring tools to effectively monitor current and potential future modern slavery risks.</p>	<p>Review effectiveness of modern slavery risk management processes.</p>
Procurement & Supply Chain	<p>Roll out new procurement policy and system and communicate widely to relevant personnel.</p> <p>Develop a supplier desk-top review and auditing schedule and ongoing evaluation process.</p>	<p>Map contract terms and conditions against supplier expectations and assessment framework to ensure compliance with terms and conditions are assessed and enforced - focus on high-risk high-volume suppliers.</p>	<p>Work towards assessing and understanding the provenance of highest risk goods.</p>
Human Resources, Awareness & Training	<p>Continue to roll out our modern slavery eLearning modules to relevant staff internally.</p>	<p>Formally include modern slavery information in contractor onboarding processes.</p> <p>Mandate completion of updated modern slavery training modules for corporate staff (account managers, operations).</p>	<p>Incorporate specific modern slavery accountabilities in relevant PDs.</p> <p>Consider rolling out modern slavery training to highest risk subcontractors and suppliers.</p>
Grievance and Reporting	<p>Continue to monitor whistleblower channel for modern slavery or human rights reports.</p>	<p>Review and update grievance and whistleblowing systems to include modern slavery and better align with the UN Guiding Principles on Business and Human Rights.</p>	<p>Develop a crisis / incident response and remedy framework to ensure instances of modern slavery are responded to appropriately and effective remedy is provided to victims.</p>

The Roadmap is a statement of intention, and actions and timings may change between now and the relevant period. It will be updated year on year in response to our business operating model, capacity and market signals.

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. Our Compliance Team monitors 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 2024 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 implementation. Updated Risk Framework.	Regular oversight on progress against modern slavery risk management plan by Compliance Team. Quarterly reporting to executive committees.
Procurement & Supply Chain	Supplier risk prioritisation. Supplier engagement. Supplier desk-top risk assessment (SAQ). Corrective Action plan review. Updated procurement policies. Updated contract clauses.	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.
Contractor Due Diligence	Contractor spend and risk prioritisation. Contractor engagement. Contractor audits.	Enhanced awareness of the issue among contractors. Ongoing improvements in contractor processes to manage risks associated with labour hire recruitment.
Awareness and Training	Modern Slavery eLearning. Awareness raising comms.	Increased awareness of modern slavery risks and mitigation actions among key staff, managers and executive.
Grievance and Reporting	Reviewed the Whistleblowing Policy and response mechanisms against UN Guiding Principles on Business and Human Rights. Improvement recommendations made.	Board engagement in Whistleblowing and remedy processes. 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 Information

Quality Excellence

In the past, quality management including our certification to ISO 9001 Quality Management System has been managed by the Compliance Team. Upon review, we identified opportunities and benefits of restructuring this function under our Quality Excellence team. This team has a mindset of quality excellence where they go one step further than quality management to surpass the expectations of our customers and stakeholders.

The team manages our Quality Management certification and document library (Certis Docs) which assists in ensuring that our staff are informed of our current expectations and practices including those relating to human rights and modern slavery risks through our policies, procedures and other related documents.

As a step further the team developed our Certis Service Delivery System (CSDS) which is our in-house system that breaks down complex scenarios into simple tasks for the individual, ensuring consistent quality excellence. CSDS is one of several tools in the team's toolkit including Lean Six Sigma+, Design Thinking and Data Analytics to ensure excellence and spur innovation.

Our Quality Excellence team work closely with the Work Health Safety and Environmental team in the planning, coordinating and management of these interrelated functions. By working together they identify and close gaps, and make sure that everyone has access to and understands the policies, procedures and practices that we use to manage health and safety, the environment, and our quality standards.

Our Approvals

This statement was approved by the board of directors of Certis Australia Pty Ltd on 30 September 2024.



Brett Pickens
Chief Executive, Australia



MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the principal governing body of Certis Australia Pty Ltd as defined by the *Modern Slavery Act 2018 (Cth)*¹ (“the Act”) on 30 September 2024.

Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of the board of directors of Certis Australia Pty Ltd as defined by the Act:



Brett Pickens

Chief Executive, Australia

Mandatory Criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in Section 16 of the Act:

Mandatory Criteria	Page Number/s
a. Identify the reporting entity.	2
b. Describe the reporting entity’s structure, operations and supply chains.	7-12
c. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	13-14
d. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	15-20
e. Describe how the reporting entity assesses the effectiveness of these actions.	21
f. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	22
g. Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	22

* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement ‘Do not own or control any other entities’ instead of a page number.

** You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

- Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph – a prescribed body within the entity, or a prescribed member or members of the entity.
- Section 4 of the Act defines a responsible member as: (a) an individual member of the entity’s principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee – that trustee; or (c) if the entity is a corporation sole – the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001 – the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph – a prescribed member of the entity.