



# ASSETLINK SERVICES PTY LTD MODERN SLAVERY STATEMENT

Reporting Period 2023/2024



## 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 2024 to identify and mitigate modern slavery risks within the business and across our supply chains.

Note. 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

**Included Entities:** AssetFuture; AssetProjects; Assetlink Indigenous Services; Assetlink Village Services

**Registered Address:** 3.04, 1G Homebush Bay Drive, Rhodes NSW 2138

**Website:** [www.assetlink.com.au](http://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 13 of the Commonwealth Modern Slavery Act 2018, for the period 1 July 2023 to 30 June 2024 (FY24). 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:

**Assetlink Enterprise Risk**

**Email:** [modernslavery@assetlink.com.au](mailto:modernslavery@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.



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## CEO Message

Upholding Assetlink's unwavering commitment to the eradication of slavery, I present here the Assetlink Services Modern Slavery Statement for FY24 - our fifth consecutive reporting year.

While the reporting entity for this Statement may be Assetlink Services, this statement is presented as a reflection of actions that all entities within the Assetlink Group have undertaken to foster a more equitable culture, free from human bondage. Our successes this year include,

- Sustained achievement of Performance Indicators,
- Internal System Audits validating our risk controls are in place, and effective,
- External audits without major or minor non-conformance,
- Closeout of Corrective Actions, on time,
- Zero complaints made to whistleblower hotline, and
- Positive feedback from Clients (and their assurance partners).

From this position of success, I reflect on Modern Slavery more broadly to define what I see as necessary to drive broader social change and Assetlink's contribution to that future. Already we're seeing green shoots of change through alignment with our clients and suppliers who are actively collaborating with Assetlink through knowledge sharing and fostering our mutual connections to realise risk-down. This should be celebrated as it's indicative that many organisations are maturing and moving away from compliance to a philosophical embrace of a world where upholding human dignity is a way of life.

Despite a relatively unchanged risk landscape within our business, we remain committed to refining our strategies and strengthening our client and supplier partnerships to ensure that we continue to remain at the forefront of change and improvement. The expectations for Assetlink are to be proactive in all that we do, and I trust this report gives insight into how our business has realised these expectations in FY24.

Continuing with the theme of a progressive agenda beyond our organisation supply chain, we look forward to the upcoming appointment of an Australian Modern Slavery Commissioner to further the objectives implementing modern slavery reform. Assetlink monitor developments and welcome any initiatives that improve the effectiveness of the Act.

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 2023 to 30 June 2024. In my role as Chief Executive Officer for Assetlink Services, I'm pleased to sign this statement which was presented and approved by the Assetlink Services Board on 27 September 2024.

Phillip Thomson  
Chief Executive Officer

Assetlink Services

14 October 2024



Phillip Thomson  
Chief Executive Officer  
Assetlink Services



## Section 1: Our Structure, Operations and Supply Chain

Headquartered in Rhodes 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 two contracts  
that are 75% contractor-  
delivered)



## Assetlink Services Geographic Presence (Australia)

Including Partner (Contractor) Presence-



Assetlink Services are present at over 1500 locations in Australia and New Zealand.





## Our Structure, Operations and Brands

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**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%

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**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%

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**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%

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**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%

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**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%

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## Operations Overview

The Assetlink Group excels in delivering top-tier services across diverse industry sectors, from large-scale national portfolios to single-site facilities. We service a breadth of industry sectors including Government, Education, Health, Aged Care, Resources & Industrial, Retail, and Commercial sectors.

Our Assetlink Services business which provides Cleaning, Security, Maintenance and Guest Services, thrives on securing and retaining contracts via rigorous tender and negotiation submissions. This drives us to continuously innovate and stay ahead of market competitors. Upon securing new contracts, our dedicated teams are deployed to client sites, where they deliver exceptional services, embody the client's brand, and collaborate closely to ensure mutual success.

As a leading Australian-New Zealand enterprise, Assetlink operates at over 1700 locations across every state and territory, with offices in Auckland, Brisbane, Sydney, Melbourne, Adelaide, and Perth.

To maintain our industry-leading standards, we leverage the expertise of specialist suppliers and contractors, ensuring outstanding service delivery. We are committed to ethical practices and we expect our suppliers and contractors to comply with our performance standards and expectations on Modern Slavery

## Supply Chain Overview

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.

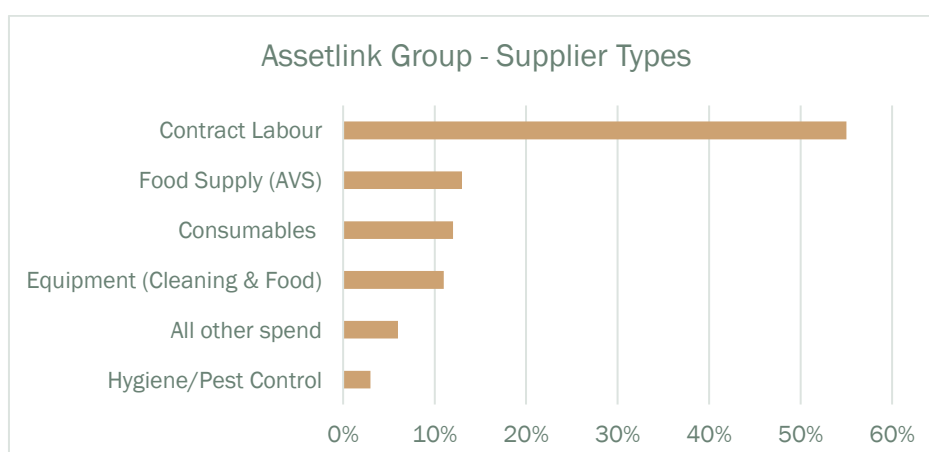
Our Procurement team, in collaboration with our Compliance function, lead the strategic sourcing, supplier assessment, pre-qualification and onboarding processes. The contractual expectations for our suppliers are defined and validated through Audit by the Finance (Commercial) function.

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

Any supplier now working with Assetlink will experience greater Ethical Sourcing rigour (including Modern Slavery assessment) in their initial Pre-Qualification. Assetlink set high performance standards for any supplier and we use CM3 pre-qualification solutions to capture evidence of compliance. To be CM3 qualified, any provider (supplier or contractor) must now complete additional pre-qualification checks relating to Modern Slavery. The responses to the Modern Slavery pre-qualification assessment are risk rated to define additional compliance checks.

## Supply Chain at a Glance

While the Assetlink Group source their supplies through 900 vendors (FY24), 94% of this spend is with just 100 businesses. A breakdown of all Supplier types is detailed below.



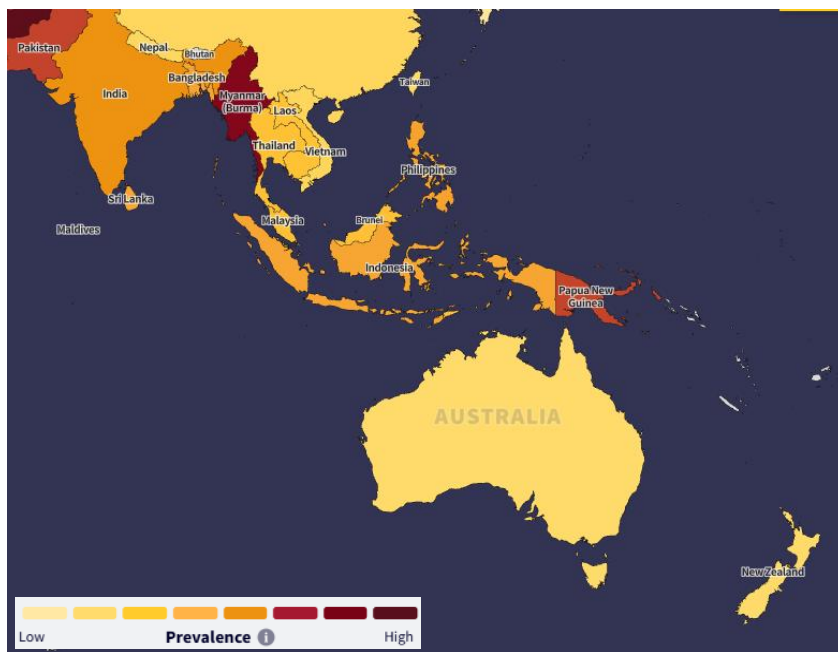




## Section 2: Mitigating Modern Slavery Risk

### Macro Risk Context: Services Industry in Australia and New Zealand

While Asia and the Pacific has the largest number of people considered to be victims of Modern Slavery, (estimated at 29.3M people) (Walkfree global slavery index) our operations and supply chain are undertaken predominantly in Australia and New Zealand, which are considered low risk. We acknowledge the industry sectors of Cleaning and Security are typically recognised as high-risk industries underlining the importance of having rigorous Modern Slavery



**Source:** Walk Free Global Slavery Index - Asia and the Pacific (2024)

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. Assetlink draw on a range of external sources to stay abreast of Australian and International Modern Slavery trends. Sources include,

- Modern Slavery in Australia (Australian Government)
- Anti-Slavery Australia
- Australian Human Rights Commission
- Property Council of Australia
- UN Global Compact Network

FY24 for Assetlink saw the emergence of informal networks emerging with our client base to engage and align on Modern Slavery Risks. This included the opportunity to present to their internal anti-slavery committees opening up dialogue to explore solutions to Modern Slavery; contribute to initiatives at a client portfolio level; and share learnings from professional bodies.

FY24 saw many of our clients add Modern Slavery to their quarterly supplier evaluation meetings to ensure their Slavery expectations are defined and provide Assetlink opportunity to contribute how these objectives are met.



## Industry Sector & Population Vulnerabilities

Operations and Supply Chain risks by Assetlink service offer:

Service	
Cleaning Services	Very High
Consumable Supply	Very High
Hospitality Services	Very High
Waste Management	Very High
Pest Control	High
Grounds and Landscaping	High
Security Services	Medium

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

The potential vulnerabilities of the workforce we engage relate to several intersecting factors. They include employment in traditionally low-wage, low-skill positions, and the lack of awareness or access to information about their rights (and legal protections) make these audiences susceptible to exploitation.

More than 50% of the Assetlink Services employee population are on some form of Visa arrangement. By understanding this profile allows us to recognise that our people may have additional vulnerabilities due to language barriers, reduced social networks, and fears of deportation or discrimination. We also recognise that the nature of the work, performed outside business hours or in isolated settings can also make it difficult to report abuse. Identifying and mitigating Slavery Risks is paramount to preventing exploitation of our workforce and the strengths of our Risk Controls is an Assetlink market differentiator and an attraction proposition for future employees seeking to evade unscrupulous employers.

By monitoring external data against risks defined by our industry sectors and services, allows Assetlink to pre-empt and better respond to our risk profile and ensure adequate resources to offset potential 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.

The nature of our business has not altered over the past reporting cycle and there were no significant changes to the Corporate Risk Register for Modern Slavery.

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.

**In FY24**, Assetlink invested in an upgrade of our immigration Visa management system to provide greater visibility of visa status, identify non-conformance and allow meaningful dialogue with our team members to resolve any potential breaches.

Assetlink continue to have our Modern Slavery risk controls validated by external entities (typically commissioned by our clients), and have pride in that there were no Corrective Actions issued in FY24 for absent or ineffective controls,

### Our Contract Workforce:

Where additional subcontracted services are used (e.g., specialist cleaning services such as external high glass or hygiene services; support for our remote or regional sites or on a short-term basis when there is peak demands.), Assetlink engages strategic partners through formal commercial agreements.

Engagement of a contract or sub-contract workforce is only done with Client endorsement. Assetlink remains transparent in these engagements. Assetlink disclose all sub-contractors, work type and spend in our quarterly performance reviews with new

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.

**In FY24** Assetlink sustained the ongoing evaluation of suppliers, risk rating them and identifying improvement opportunities for both the vendor and us.

Remaining transparent in our anti-slavery practices, Assetlink have adopted a section on Modern Slavery performance reporting with all our clients (irrespective of whether it is a contractual requirement) to ensure visibility of action is sustained.



## Our Consumable Suppliers:

Managing Modern Slavery risks associated with our consumable suppliers, we recognize the potential channel for modern slavery practices to occur, particularly given the global nature of the industry and suppliers. To offset this risk, Assetlink typically source products from Australia or New Zealand who bring lower levels of exposure.

To offset risks, Assetlink conduct supplier due diligence checks, engaging with our suppliers to ensure compliance with ethical sourcing standards, and upholding our monitoring and assurance programs. By fostering long-term partnerships with our suppliers, and providing clarity of expectation in supply, we achieve our objectives of maintaining a slavery-free supply chain.

### IMPORTING RISK

Measuring the connection between modern slavery and global imports. G20 countries rank among the largest importers (and exporters) in the world. The importing risk analysis provides a high-level indication of how the world's most developed countries are connected to modern slavery, not only through exploitation occurring within their own borders but also through the goods they import.



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 **FY24** there were no material changes to our scope of work or supply chain which did not invoke any departures from our current supplier base. Assetlink continue to monitor non-conformances in our supply chain via external reporting and internal audit. We have in place triggers to identify providers and define actions we take when non-compliance is identified. These actions are documented in our Procurement and Modern Slavery Operating Procedures.



## Section 3: Mitigation and Approach to Managing Risk

### Modern Slavery Risk Appetite Statement:

The level of risk the Assetlink Group is willing to accept in relation to modern Slavery is low. We have zero tolerance for any form of modern slavery within our operations and expect the same from our partners and suppliers.

### 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, (ASL-DOC-022E Risk Management Standard)

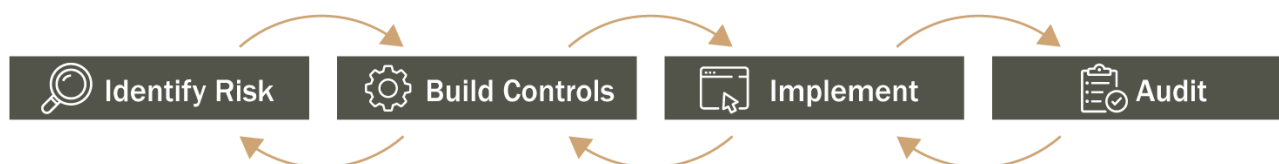
With little material change to statutory obligations; scope of work; or providers in our supply chain, there was little change triggered in our risk profiling (controls or otherwise). **FY24** risk management focused predominantly on maintaining compliance to existing controls.

Of all external Audits conducted on Assetlink by external assurance bodies, there were no Corrective Actions issued in FY24 for absent or ineffective controls,

One observation (a recommendation as opposed to a non-conformance) raised in FY23 was to automate more of our payroll processes to eliminate potential for underpayment of workers. In **FY24**, a business case was endorsed to improve our rostering and workforce planning to ensure automated and compliant rosters.

### 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 organisation 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. This level of maturity has driven a shift in focus of the Modern Slavery Committee to focus more closely key dimensions of the Act (Organisation structure, Operations and Supply, Consultation and Training)) to realise further improvements.

## Governance & Risk Oversight:

To ensure our risk controls are effective in lowering the residual risk ratings for each identified risk of enterprise Modern Slavery, assurance activities and responsibilities are defined in the corporate risk register.

Aligned to the identified Risk Themes (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)
- Head of People and Culture
- 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 **FY24**, with no material change to operations, supply, or associated risk, the Modern Slavery Committee maintained a watching brief of Performance Indicators to confirm progress against objectives. There were no material changes to risk controls in FY24. Focus was on confirming effective implementation.





## 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 FY24, there was little change to either the type of services engaged by Assetlink or the risk profile associated with those services or products. Risk Management in the supply chain for FY24 focused on embedding existing controls and furthering the application of ESG supplier assessments across the supply chain.

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.



## Section 4: Assessment of Risk-Control 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 FY24 evaluation is detailed below.

Risk Dimension	How we Assess	FY24 Outcomes (Evidence)
Policy & Governance	<ul style="list-style-type: none"> <li>Regular Policy and procedure review</li> <li>Implementation of policy in workplace</li> <li>Modern slavery committee in place and meeting regularly.</li> </ul>	<ul style="list-style-type: none"> <li>Committee meeting minutes</li> <li>Simplified &amp; republished Modern Slavery policy (previous, Anti-Slavery Policy)</li> <li>Created Modern Slavery procedure defining actions required to meet the policy objectives</li> </ul>
Risk Profiling	<ul style="list-style-type: none"> <li>Continuously review and improve the Corporate Risk Assessment relating to Slavery.</li> <li>Evaluate change to Client, Vendor and workforce to identify and manage new risks.</li> <li>New Vendors issued</li> </ul>	<ul style="list-style-type: none"> <li>Undertook select audits at 10 sites.</li> <li>Confirmed defined controls matched workplace application.</li> <li>Conducted randomized salary reviews of team members at select sites confirming alignment of Position Description, Contract, &amp; Salary.</li> </ul>
Audit & Assurance	<ul style="list-style-type: none"> <li>Audit undertaken against schedule.</li> <li>Undertake external, independent audit of internal Assurance strategy</li> </ul>	<ul style="list-style-type: none"> <li>Audit schedule and progress to plan reported monthly in Compliance Manager ELT reports.</li> <li>No major non-conformances identified (internal or external audit)</li> </ul>
Performance Monitoring	<ul style="list-style-type: none"> <li>Regular performance monitoring and publishing of results to ELT. Metrics currently monitored: <ul style="list-style-type: none"> <li>Meetings Held to plan.</li> <li>Modern Slavery Training</li> <li>Statement Publish</li> <li>Strategic actions to plan</li> <li>Non-conformances</li> <li>Audits to plan</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>90% of Meetings Held to plan.</li> <li>Modern Slavery Training &gt; 70%</li> <li>Statement Published &amp; available.</li> <li>Zero breaches</li> <li>Audits to plan (110%)</li> </ul>
Training & Development	<ul style="list-style-type: none"> <li>Effectiveness of training measured through uptake (completion of training) and workplace application.</li> </ul>	<ul style="list-style-type: none"> <li>All Team Members (3000+) have Modern Slavery training assigned as a mandatory training requirement</li> </ul>
Grievances & remediation	<ul style="list-style-type: none"> <li>Monitor reporting trends (Volume &amp; nature)</li> <li>Team Member feedback</li> <li>Supplier feedback</li> </ul>	<ul style="list-style-type: none"> <li>Actions responding to grievances were documented in updated slavery response procedure.</li> <li>There were no grievances raised via our internal reporting hotline.</li> <li>No clients raised employee grievances from any team members accessing their grievance reporting mechanisms.</li> <li>No supplier grievances were raised.</li> </ul>



**Summarising:** In FY24, effectiveness of our Modern Slavery actions were validated through,

- Achievement of Performance Indicators
- Internal System Audits
- External audits without major or minor non-conformance
- Closeout of Corrective Action on time
- Zero complaints made to whistleblower hotline.
- Positive feedback from Clients.

While we recognise we still face many challenges as our awareness and maturity in Modern Slavery increases, we remain confident that our current processes to drive continuous improvement remain robust 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 FY24, 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. We were not aware of any failings identified in our supply chain.

## 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.

The responsibility for auditing our suppliers rests with the Director- Commercial, our Group Procurement Manager and our National Compliance Manager.



## 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 and is validated through our Audit and Assurance Programs (**ASL-PRO-005C Internal Audits**)

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

Consulting with our Team Members, irrespective of entity, is defined in our internal procedure, **ASL-PRO-006S WHS Consultation & Communication**

### 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. 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.

**FY24** has seen a shift in engagements with our clients. There has been a marked shift from 'Compliance' to 'Alignment'. Un-prompted, more clients are actively seeking to engage with Assetlink in a consultative manner to mutually explore improvements to managing Modern Slavery risk as a societal issue as opposed to meeting statutory obligations. This has led to peer-working relationships with clients such as Sydney Airport and Lendlease.



## Section 6: Training, Capability Building and Procedures

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.

In the five years of publicly reporting our Modern Slavery commitments, we have not had any breaches of our policy and there have been zero connections with our Whistle Blower hotline.

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 modules continue to remain a mandatory training requirement for all Team Members. When commencing employment with Assetlink, our people complete training on Modern Slavery and is linked closely to our defined values that are cemented into our Code of Conduct, also part of their induction process. Compulsory refresher training in Modern Slavery and Code of Conduct is undertaken annually.

As a result of consultation (see Section 5), the Modern Slavery Policy (**ASL-POL-010X Modern Slavery Policy**) was overhauled from top to bottom in FY24. It split out the content into statements of intent (the Policy) and the application of our Risk Controls was documented into an improved procedure (**ASL-PRO-001B Managing Modern Slavery**)

To deploy the Policy and Procedure effectively, an online toolbox talk was developed and deployed to all Team Members (in addition to their existing Modern Slavery training).

In addition to the specific Modern Slavery Policy / Procedure, Assetlink ingrains our work patterns free from slavery by documenting expected work practices in a range of other internal guidance materials, they include,

- Whistle blower hotline,
- Business Code of Conduct,
- Corporate and Social Responsibility Policy
- Sustainable Supply Chain Procedure
- Audits, Complaints and Improvements Policy,
- Diversity & EEO Policy,
- Grievance Procedure,
- Supplier audit procedures, and
- Sustainable procurement and supplier conduct.

In **FY24** Assetlink upgraded its Learning Management System (LMS) and the transfer of learning data relating to Modern Slavery will be transferred to all existing Team Members. New Team Members are assigned Modern Slavery Training as a mandatory pre-requisite prior to starting work.

In **FY24** the Modern Slavery Policy and Procedure were both completely overhauled making the content simpler and the procedural application of controls more pragmatic for our managers and Team Members.





## 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 FY25 to further eradicate Modern Slavery, include:

Dimension	Actions Planned for FY25
<b>Risk Identification &amp; Governance</b>	<ul style="list-style-type: none"><li>• Publish Modern Slavery performance indicators in corporate risk reports.</li><li>• Validate risk controls through audit.</li><li>• Detailed enhancements to risk management in FY24 statement.</li><li>• Document governance structure and publish in FY24 statement.</li></ul>
<b>Audit &amp; Assurance</b>	<ul style="list-style-type: none"><li>• Continually review existing controls.</li><li>• Enhance assurance actions, documenting all activities to validate controls are in place and effective.</li><li>• Incorporate Modern Slavery as a risk type in our Corrective Action system.</li><li>• Sustain track record of no major non-conformances.</li></ul>
<b>Client Engagement</b>	<ul style="list-style-type: none"><li>• Include Modern Slavery performance in ALL client performance reviews.</li><li>• Align with more client whistle-blower programs</li></ul>
<b>Training &amp; Education</b>	<ul style="list-style-type: none"><li>• Publish training performance monthly.</li><li>• Drive completion by entity.</li></ul>
<b>Supply Chain</b>	<ul style="list-style-type: none"><li>• Complete assessment of all Suppliers</li><li>• Embed Modern Slavery assessment into onboarding actions for new suppliers.</li><li>• Undertake audits of high-risk Tier 1 suppliers</li></ul>
<b>Contractual &amp; Commercial Obligations</b>	<ul style="list-style-type: none"><li>• Ensure all new and existing clients have updated contracts that are inclusive of modern slavery expectations.</li></ul>
<b>Recruitment &amp; Human Resources</b>	<ul style="list-style-type: none"><li>• Enhance grievance procedure.</li><li>• Update and strengthen related policies (EEO etc.) to incorporate more explicit Modern Slavery references.</li><li>• Explore payroll system enhancements including automation</li></ul>

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

**End of Statement**



## References

Australian Modern Slavery Act 2018(Cth)

NSW Modern Slavery Act 2018

## Version History

Reporting Period	Summary of Changes / Edits	Author
FY20	Initial Release	Janine Rauscher
FY21	<ul style="list-style-type: none"><li>Confirmed content.</li><li>Minor formatting changes to improve readability.</li><li>Added Author and Contact details.</li><li>Reflected FY21 actions/achievements</li></ul>	Chris Dow
FY22	<ul style="list-style-type: none"><li>Complete review of all sections</li><li>Update of content to reflect practices.</li><li>Readability improvements</li><li>Highlight boxes to detail achievements of the reporting period.</li></ul>	Chris Dow
FY23	<ul style="list-style-type: none"><li>Review and update all sections.</li><li>Document FY23 achievements.</li><li>Define FY24 objectives</li></ul>	Chris Dow
FY24	<ul style="list-style-type: none"><li>Review and update all sections.</li><li>Document FY24 achievements.</li><li>Define FY25 objectives</li></ul>	Chris Dow



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