

Modern Slavery Statement



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

The following entities are not currently undertaking any commercial transactions:

- PSI Corporate Pty Ltd
- Business Risks International Training and ELearning Centre Pty Ltd.

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



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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 goes back for 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, Certis has 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.

We are pleased to publish our third 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 effects of COVID-19, we continued our focus 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 could. 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.

2022 Modern Slavery Risk Management Initiatives

In FY22 we continued to raise awareness about modern slavery risks among our employees, suppliers and contractors and procured an additional three modern slavery eLearning modules. We formalised roles, responsibilities and accountabilities for modern slavery risk management and expanded our enterprise risk framework to ensure modern slavery risks are effectively integrated into risk assessment processes. We undertook follow up audits of external security contractors that sit within our top 60% of spend. We conducted desk-top risk assessments of our potentially highest risk direct suppliers and continue to work with these suppliers to ensure corrective action plans are implemented. Working with priority Tier 1 suppliers enabled us to identify potentially high-risk Tier 2 suppliers.

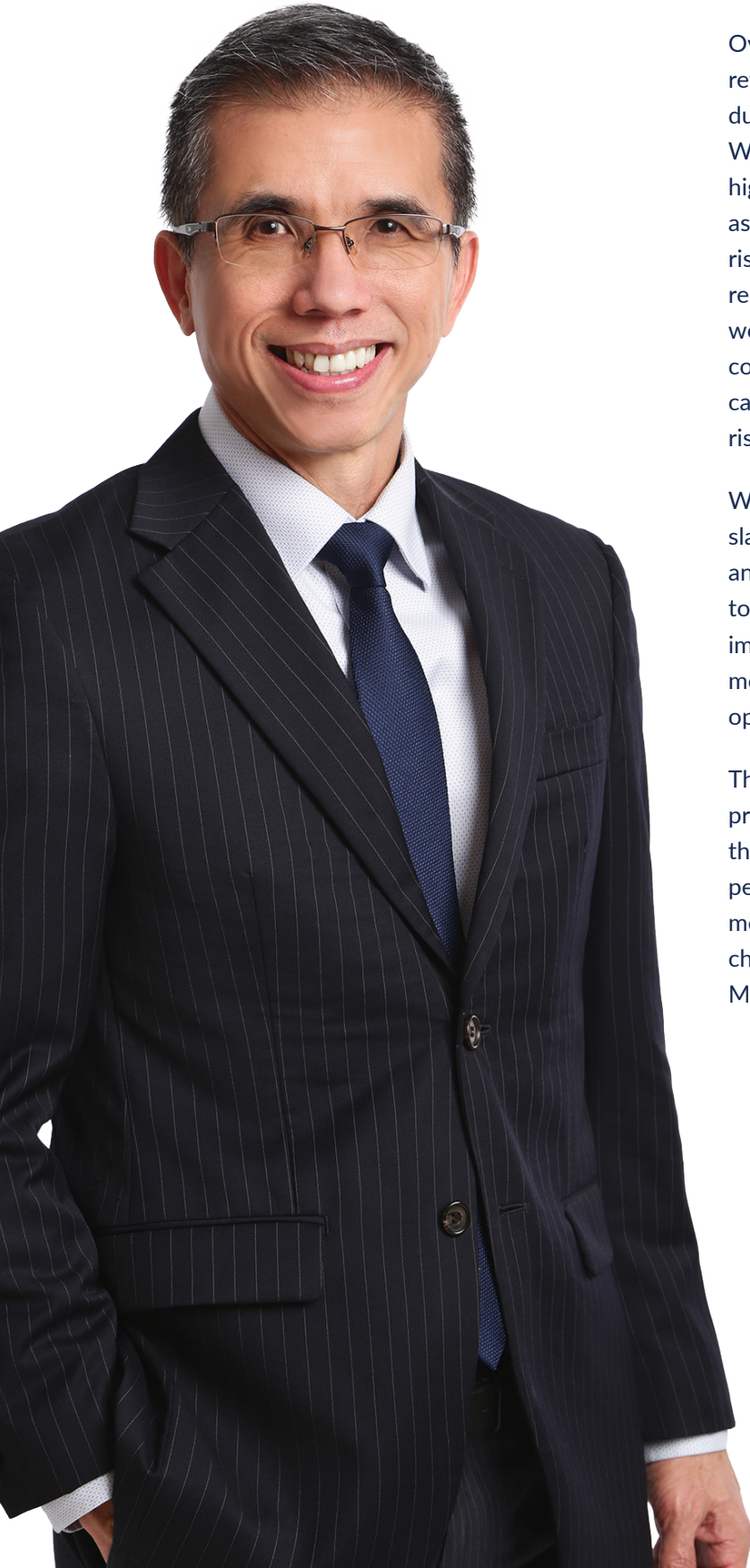
Our Plans for 2023

In 2023 we will review, extend, evaluate, and improve our modern slavery risk management program, ensuring it reflects any updates or changes to the Commonwealth legislation. We will re-do our gap analysis and prepare a new 12-month action plan and three-year road map (2023 - 2026). Our priority will be to establish performance standards and evaluation criteria for our suppliers and contractors, and review supplier corrective action plans to strive for continuous improvement. We will also work more closely with our SME 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 even further to include more formalised board training as well as training all staff and management on grievance mechanisms and effective modern slavery remedy processes.

Our Plans Beyond 2023

Beyond 2023 we will build on the actions undertaken to ensure we continue to improve our approach to modern slavery risk management in a way that reflects any changes to the Commonwealth legislation. Engaging and educating our potentially highest risk and highest spend suppliers remains a priority as does working with, and supporting our smaller suppliers in risk mitigation initiatives. To this end we will continue to distribute our modern slavery eLearning modules and guidance for SMEs and provide advice and support where we can.

A Brief Statement from Kang Song Lim, Chief Executive, Australia



Over the past 12 months we have continued to refine and expand our supplier and contractor due diligence processes for modern slavery. We engaged our highest spend and potentially highest risk suppliers in a modern slavery self-assessment questionnaire and issued them with risk-based reports and practical improvement recommendations. Over the next 6-12 months we will work with these suppliers to ensure the corrective actions are implemented so that we can better manage our collective modern slavery risk.

We purchased an additional three modern slavery eLearning modules to ensure our staff and contractors 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.

Reporting Criteria 1 & 2: About Certis Australia

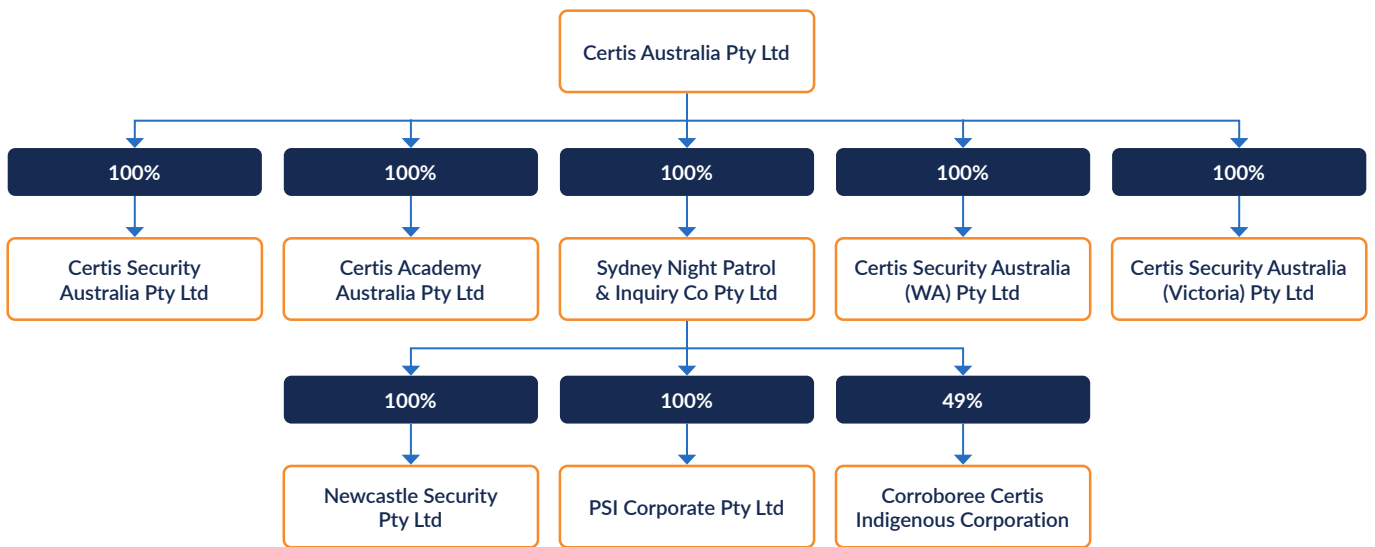
Our Organisational Structure

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, Sydney Night Patrol & Inquiry Co Pty Ltd, Business Risks International Training and ELearning Centre Pty Ltd, and PSI Corporate 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

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

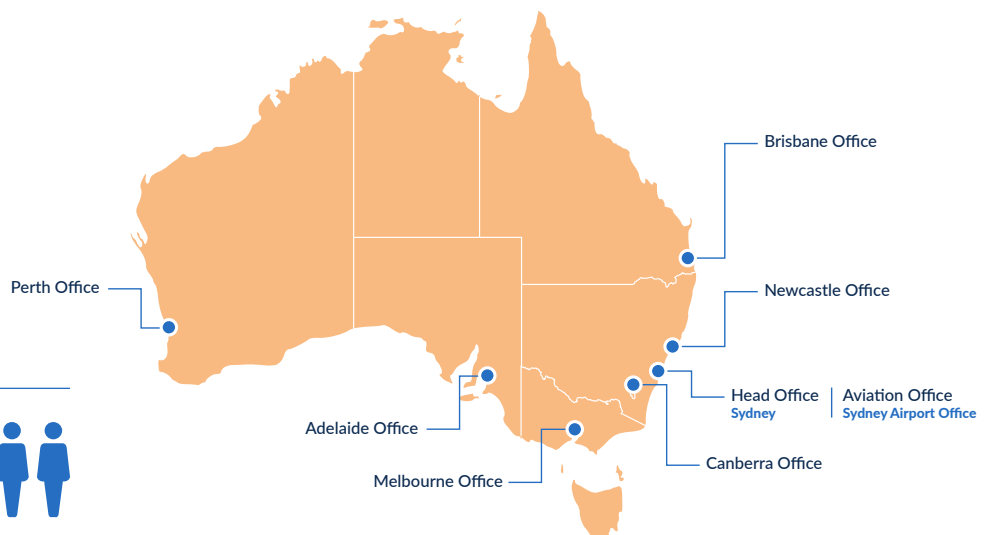
We have
2892
employees.



559 Female Employees
(Including 6 female indigenous employees)



2333 Male Employees
(Including 18 female 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
- 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 to help measure the temperature of your staff and visitors to reduce the risk of spreading COVID-19.

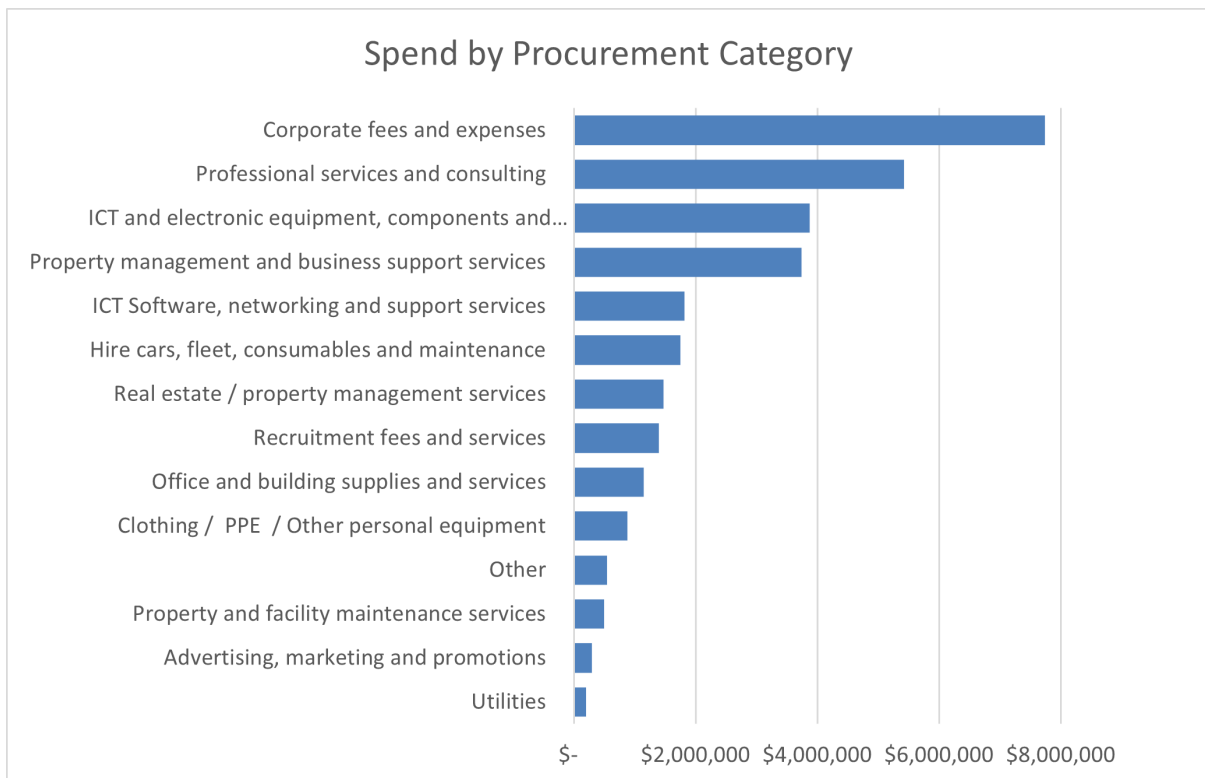
Our Supply Chain

Certis Australia spent a total of \$32.2million with 444 suppliers of goods and services in FY22. This figure does not include spend on our resource contractors that deliver security services on our behalf. Analysis of our resource contractors was undertaken in FY21 and will be redone in FY23.

Certis Australia’s Tier 1 suppliers and subcontractors are predominantly located onshore, with 96% located in Australia and 4% in the United Kingdom, the United States and Singapore. Similarly, 98% of our spend is with Tier 1 suppliers located in Australia and the other 2% of spend with suppliers based overseas.

The main categories of goods and services we procure are largely consistent with our 2021 Modern Slavery Statement (Figure 1). Main categories of goods and services 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.

Figure 1 Spend by Procurement Category



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. In 2021 we started mapping our extended supply chain and identified several potentially high-risk Tier 2 suppliers (see Case Study on page 12). An important part of this process is ensuring our direct (Tier 1) suppliers are informed, educated, and engaged to support us with this task. Engaging our direct potentially high-risk suppliers with whom we have established longer term relationships has been an important focus in this reporting year and formed a key part of our enhanced due diligence efforts to manage risk in our supply chain.

Tier 2 Suppliers Case Study

We asked major suppliers making up over 50% of our potential high risk spend to provide the names of key suppliers used to fulfill their contract with Certis Australia (i.e., our Tier 2 suppliers). The Tier 2 suppliers identified provide the following goods and services:

- ICT and electronic equipment, components, and supplies
- Electronic security equipment
- Telecommunications services and infrastructure hosting
- Software and network support services
- Building / facility operations and maintenance services

Using the same risk taxonomy we employed to assess our Tier 1 suppliers, we have identified that half of these categories are potentially high risk for modern slavery and that there is significant risk in our Tier 2 supply chain. We will work with our direct suppliers to engage and educate their suppliers on potential risks of modern slavery and opportunities to improve their risk management practices.

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 ongoing impact of COVID-19 together with resource constraints meant that some of our planned risk management initiatives were put on hold this year.

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 our subcontracting arrangements. Our supplier and subcontractor due diligence processes are described in this section.

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 Modern Slavery Statement.

In FY22, we undertook a gap analysis of our Whistleblowing Policy against the UN Global Compact's Guidance Note for Business on Implementing Effective Modern Slavery Grievance Mechanisms. We identified several gaps in our existing Policy (see Case Study below). Suggested changes to our Whistleblowing Policy and our reporting and remedy processes are being considered by our Executive.

Building on the due diligence undertaken of our security subcontractors in previous reporting periods, we conducted additional audits to ensure our modern slavery risks are effectively identified and managed (see also Criteria 4 and Case Study page 19).

Whistleblowing Policy Review Case Study

In FY22 we engaged an external contractor to undertake a review of our Whistleblowing Policy. This is to ensure it is accessible to anyone impacted by our activities and effectively captures the scope of people who may seek to make a modern slavery complaint.

The review identified opportunities to update our policy including expanding who is eligible to make a Protected Disclosure to ensure supply chain workers and the general community are captured. There is an opportunity to expand the definition of Reportable Conduct and the examples of Reportable Conduct provided in the Appendix to our Policy.

Based on the recommendations made in the review and given the requirement for a more nuanced approach to handling modern slavery complaints, we plan to expand our specific modern slavery response training to all those receiving or processing modern slavery complaints or grievances. In this way, we will ensure a victim centred approach is always taken.

The review recommendations are being considered by our Executive and will be implemented as appropriate during the next reporting period.

Supply Chain Risks

In FY22 we refreshed our supplier risk dashboard and analysed approximately \$30 million of procurement spend for potential modern slavery risk. 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

- Our risk profile has changed only slightly between reporting periods. Overall, there is a moderate level of potential modern slavery risk in Certis Australia's supply chain.
- High potential risk by spend dropped slightly (a 1% reduction) compared to our 2021 modern slavery risk assessment.
- Approximately 19% (\$5.8 million) of total spend analysed is potentially high risk for modern slavery.
- One-quarter of Certis Australia's suppliers (or 35 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

ANALYSIS OF SUPPLY CHAIN RISK

Total Spend analysed for risk:	\$30.9M
Total Suppliers assessed for risk:	140
Supplier Spend range analysed (largest to smallest):	\$3M - \$18,000
Number of spend categories assessed (goods and services):	17

Important Notes:

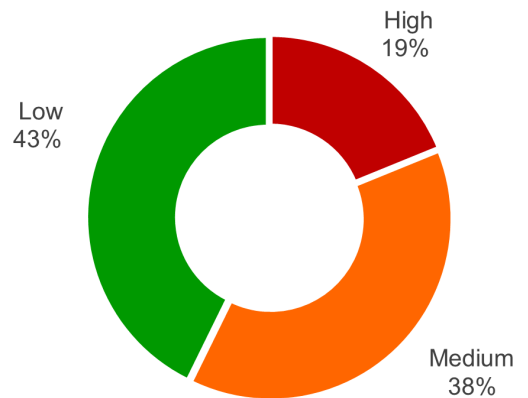
1. As for our 2021 statement, our focus in has been on Tier 1 suppliers with spend greater than \$18,000. Total spend analysed for risk covers 94% of our total spend with suppliers including those with spend less than \$18,000. We recognise that there may be significant risk amongst our smaller suppliers and will incorporate these into future risk assessments.
2. Security subcontractors were analysed separately and informed our subcontractor due diligence approach in FY22.

Risk by Spend

Analysis of \$30.9M of spend across Certis Australia entities covered by this statement indicates that 19% of total spend is potentially high risk for modern slavery. This is a one percent reduction in high risk spend from our 2021 Modern Slavery Statement.

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 Spend (% Total Spend)



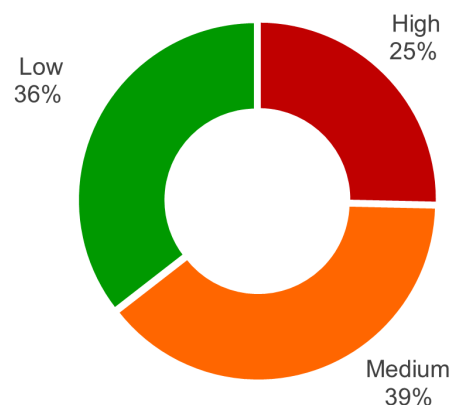
Risk by Supplier

Analysis of higher spend suppliers (see ‘Notes’ above) indicates that 35 suppliers or approximately one quarter of the 140 suppliers analysed are potentially high risk for modern slavery, a slight increase reported in our 2021 Statement.

Just under half, or 17 of the 35 potentially high-risk suppliers were also identified in our FY21 supplier analysis. We will continue to focus our due diligence efforts on these suppliers initially.

A further 54 (or 39%) are considered to present medium-level risk and 49 (or 36%) were classified as low risk for modern slavery.

Risk by Suppliers (No.)

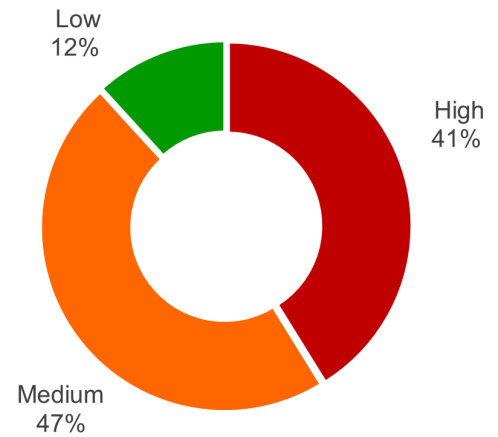


Risk by Spend Category

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
- Events and excursions.

Risk by Categories (No.)



ICT, electronics, and communications equipment makes up two thirds (66%) of our high-risk procurement.

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.

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 was reviewed and updated by our modern slavery working group at the beginning of this reporting period. 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

Certis' Australian-based Head of Compliance and QMS has overall responsibility for the implementation and review of our modern slavery risk management program. Together with her team she ensures relevant sections of the organisation are engaged and informed of new systems and processes for managing our risks. We plan to review existing KPIs and ensure modern slavery KPIs are integrated into relevant position descriptions by FY24.



Risk Framework

Our Australian-based Risk Group expanded local risk registers to capture different types of risks, including modern slavery and human rights risks. While monthly reports are prepared locally against key risk indicators, Group-wide implementation of the risk register is planned for FY23.



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 our QMS and made available to external stakeholders or other interested parties on request (see Case Study over page).

Modern Slavery Policy Case Study

The purpose of our Modern Slavery Policy is to ensure we work to identify, assess, and address modern slavery risks in our operations and supply chain. The Policy applies to all persons working for or on behalf of or providing goods or services to Certis Australia in any capacity, including all employees, officers, directors, contractors, suppliers, and any other third-party representatives.

The Policy, which is available on our internal document library, defines modern slavery and commits us to undertaking risk management actions across our operations and supply chain. The Modern Slavery Policy supports our Procurement Policy and highlights specific actions required to assess our suppliers against modern slavery risk indicators. These include reviewing the supplier's most recent Modern Slavery Statement, requesting details of actions taken by suppliers to manage modern slavery risk and ensuring suppliers are monitored where potential risks of modern slavery are identified.



Education and Training

In FY21 we purchased an initial three 10-minute modern slavery eLearning modules for our senior managers, state managers and branch managers. Targeted staff undertook training in late 2021, and an additional three modern slavery eLearning modules were procured in FY22 to expand our company's knowledge base.

Training Case Study

In FY22 we purchased an additional three modern slavery eLearning modules to ensure our executive, board, staff and contractors are educated on modern slavery risk management. The following modules have been purchased and are being rolled out to relevant staff and contractors via our cloud enabled Learning Management System:

- Module 1: What is Modern Slavery
- Module 2: Modern Slavery in the Workplace
- Module 3: Supply Chain Red Flags
- Module 4: Importing Risk
- Module 5: Business Relevance
- Module 6: Global Modern Slavery Legislation

The modules are being progressively rolled out to all Certis personnel. A training evaluation and effectiveness plan will be developed to analyse the outcomes of training provided across the business.



Supplier Spend and Risk Analysis

With the support of external consultants, we reviewed close to \$31 million of procurement spend and refreshed our Tier 1 supplier risk dashboard. Through this analysis we identified that approximately 19% (\$5.8 million) of our procurement spend is potentially high risk for modern slavery. One-quarter of our suppliers (or 35 suppliers) are considered potentially high risk for modern slavery, and we will focus our ongoing due diligence on these suppliers.



Enhanced Supplier Due Diligence

In FY22 we focused on gaining a better understanding of the measures our major potentially high-risk suppliers are taking to manage modern slavery risk in their operations and supply chains. We invited our highest risk Australian based suppliers (who collectively account for over 50% of our high-risk procurement spend identified in 2021) to participate in a modern slavery supplier survey (see Case Study below).

Enhanced Supplier Due Diligence Case Study

Working closely with external experts, our procurement and compliance teams engaged each supplier not only on how to complete the survey, but importantly on the reasons why Certis is assessing and addressing modern slavery risks. Suppliers were provided with access to a secure survey portal which included an information video, FAQs and a guideline to help them understand the intent of each survey question and the type of supporting material we required.

All suppliers invited to participate in the survey completed the questionnaire. While these suppliers are based in Australia, they also have global operations in North and South America, Europe, Africa, and the Middle East. The suppliers provide a range of goods and services to Certis, including ICT and electronic equipment, components and supplies, electronic security equipment and software and network support services.

Suppliers were assessed across three key areas – Operations, Workforce & Remedy; Governance & Due Diligence; and Risk Management. They were given an effectiveness ranking that reflects leading modern slavery risk management practices. Based on the effectiveness scores, suppliers were given a risk ranking. The lowest effectiveness ratings were in the Operations, Workforce & Remedy and Risk Management categories with 50% of participating suppliers ranked as 'ineffective'. This reflects a lack of formal processes in place to ensure workers' rights are protected and limited evidence that effective risk assessments are being undertaken by our suppliers of their own operations and supply chains.

Each of the participating suppliers were provided with a comprehensive risk-based report and improvement recommendations based on their responses. We are working with suppliers to develop and implement Corrective Action Plans based on the recommendations made.



Subcontractor Due Diligence

Our Compliance Team continued to engage subcontractors that support our workforce of direct employees. Our Subcontractor Evaluation Procedure ensures our subcontractors requiring evaluation are selected by our Compliance Team independent of the operations using a risk-based approach. This includes evaluating risk of worker exploitation and modern slavery. Although COVID-19 and resource constraints continued to limit our ability to conduct onsite audits of our subcontractors, we did manage to conduct additional virtual audits using online meeting platforms.

The following issues were reviewed in subcontractor audits:

- 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)
- Worker health and safety.

Comprehensive corrective action plans were developed for partial compliances and non-compliances and follow up actions are included in our reports to Group Risk.

Sub-Contractor Due Diligence Case Study

Eleven (11) subcontractor audits were conducted by Certis during the reporting period. When added to the twenty (20) audits undertaken in the last reporting period, these subcontractors accounted for 66% of spend on all subcontractors used in FY22.

Through our evidence-based auditing program it was found that a vast majority of subcontractors are complying with their legislative and contractual obligations. As per findings in last reporting period, opportunities for improvement were identified, such as formalising WHS processes and enhancing policies and procedures in this area. 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

We will continue to implement our due diligence program to ensure that subcontractors comprising more than 60% 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.	Mapped modern slavery risks and vulnerabilities along our supply chain (identified risks in priority Tier 2 suppliers).
Action plan and three-year roadmap developed.	Documented responsibilities for managing modern slavery risks across the organisation.	Conducted desk-top reviews and SAQs with highest risk/highest priority suppliers to address 52% of high risk spend.
Working Group established.	Reviewed existing procurement policies and procedures for alignment with modern slavery legislative reporting requirements.	Developed corrective action plans with highest risk suppliers.
Board and Senior Leadership Team engaged.	Educated senior management on modern slavery risks and legislative requirements.	Developed modern slavery supplier engagement process for potentially higher risk lower spend suppliers (including PPE and uniform supplier).
Tier 1 suppliers identified and prioritised according to modern slavery risk.	Undertook risk prioritisation of external security contractors.	Reviewed our Whistleblowing Policy and process against UN Guiding Principles on Business and Human Rights and the UN Global Compact's key actions for modifying whistleblowing mechanisms. Submitted suggested changes to Executive for approval.
Draft Modern Slavery Policy developed.	Promoted/communicated modern slavery policy internally.	Purchased and started to roll out additional modern slavery eLearning modules for staff .
	Created modern slavery awareness and training program for staff and contractors.	Updated our supplier risk dashboard and further prioritised suppliers for additional due diligence.

We will re-do our modern slavery gap analysis in the next reporting period and refresh our action plan. This will be done to ensure it reflects changes to the modern slavery legislative requirements and our own governance maturity in this area.

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. Supplier desk-top risk assessment (SAQ). 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 subcontractors. Ongoing improvements in subcontractor processes to manage risks associated with labour hire recruitment.
Awareness and Training	Training Needs Analysis. 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

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. Additionally, our Head of Compliance was elected to the Board of Directors through an Australian Electoral Commission vote in 2021. ASIAL plays a key role in driving Australian Standards, developing codes of conduct, and raising the level of professionalism within the industry. As the voice of the industry, ASIAL performs a key role in representing the interests of the industry at a Federal and State/Territory government level.

Through our direct involvement in industry forums and our Head of Compliance's board position, we are actively helping raise awareness and drive change in our industry sector to better manage and mitigate risk of modern slavery and worker exploitation.

Our Approvals

This statement was approved by the board of directors of Certis Australia Pty Ltd on 30 September 2022.



Kang Song Lim
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 2022.

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 Act²:



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.	8
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.	12
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
e. Describe how the reporting entity assesses the effectiveness of these actions.	20
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).*	21
g. Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	21

* 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.

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- 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.