



Golden Star Security Pty Ltd  
ABN: 47 166 435 105

## Modern Slavery Statement

### Introduction

Golden Star Security Pty Limited ABN 47 166 435 105, registered office Level 1 NW F01a, 122 Studio Lane, Docklands VIC 3008, (Trading as GSS Group Security) specialist in security service which includes providing unarmed security guards, crowd controllers, security control room operators and other labor hire activities in security industry across Victoria Australia. GSS Group recognizes that all businesses have an obligation to prevent slavery, slavery-like practices and human trafficking and will do all in its respective power to prevent slavery, slavery-like practices and human trafficking within its business and within the supply chains through which it operates.

This statement addresses GSS Group's obligations and compliance in relation to the 'Modern Slavery Act 2018 (Cth)' and the 'Modern Slavery Act (2018) (NSW) (together, 'the Act') and highlights the steps we take to ensure there is no slavery or human trafficking occurring within the organization or its supply chains. One of our company's most valuable assets has always been its reputation for integrity and fairness. Maintaining this reputation within our market is an essential prerequisite to our continued success.

GSS Group acknowledges that it is required to submit its modern slavery statement within 6 months of the end of each reporting period.

### GSS Group structure & operations

Golden Star Security Pty Ltd (GSS Group) is an Australian proprietary company that is 100% Australian Owned and managed by its management and team based within Australia. GSS Group is subject to the 'Modern Slavery Act 2018 (Cth)' which covers itself and any future subsidiary or current partner entities, and it produces a statement in relation to the requirements of the legislation on behalf of Golden Star Security Pty Ltd and is signed by its Managing Director and is available on the GSS Group's website.

GSS Group has added more experienced team members to minimize risks of malpractices in the business and for the purpose of accountability within the company.

GSS Group operates across the private and public sectors, employing part-time, full time, and casual staff in Melbourne Metropolitan and Regional Victoria.

Our services are categorized as follows:

- Asset Protection Security (Unarmed)
- Crowd Control
- Security Control Room Operations
- Security Patrols Service
- Loss Prevention Officers
- Security and Concierge Service
- Emergency Response
- RSA and other security Labour hire services

Modern slavery can take many forms including the trafficking of people, forced Labour, child Labour, servitude, slaved labour, and other malpractices. As a licensed Labour hire company, we take our responsibility for supplying staff extremely seriously and are aware of the potential for being targeted by traffickers and unlicensed Labour hire providers, in local jurisdictions where licensing is a requirement. Our own processes around staff hiring and recruitment ensure our employees are alert to the signs of exploitation, so that we may





take the necessary action promptly and effectively should it be identified. Sectors affected by Modern Slavery include, but are not limited to, Labour hire (security and cleaning), construction & property, engineering & manufacturing, and health & social care.

GSS Group understands that the Labour hire industry is the most targeted area which can be subject to Modern Slavery, and we also understand our commitment to all Labour hire related legislations.

## GSS Group' supply chains & risks of modern slavery

### Labour hire supply

Our supply chains include hiring security staff for our security projects including residential and commercial buildings, retail centres, entertainment and sporting venues and educational institutions. This may involve direct recruitment of staff or hiring through different sourcing companies including recruitment agencies. Regarding Labour hire specifically, the recent reports identified five high risk sectors which were horticulture, meat processing, cleaning and security. In addition, Victoria under its labour hire licensing scheme identifies poultry processing as a high-risk sector, and South Australia under its labour hire licensing scheme identifies trolley collection and seafood processing as high-risk sectors.

GSS Group has license from Victorian Labour Hire Licensing Authority as required under the various state and territory licensing schemes. Of the high-risk sectors, GSS Group supplies security staff to its clients maintaining its compliance status to Victorian Labour Hire Licensing Authority.

### Suppliers to GSS Group

We prefer to use our direct staff because using third-party Labour hire service providers is hard to ensure their compliance with laws and legislations. In limited circumstances where we need to outsource any task or a portion of a project to third parties, GSS Group has implemented contractors' compliance checks which includes their licenses and annual report of wages paid to their workers. Additionally, GSS Group operations team enquires contractors' staff about any unlawful activity including but not limited to, underpayment, unfair treatment and discrimination at workplace.

We acknowledge that by virtue of contracting with other parties, whether as a client or as a supplier, there is always some risk that may contribute to modern slavery practices. We expect our suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally compliant, and professional manner by adhering to the GSS Group Supplier Code of Conduct. We also expect our suppliers to promote similar standards in their own supply chain.

## Actions taken to assess and address modern slavery risks

### Suppliers Audits

During 2024, GSS group accounts team conducted audits of suppliers by randomly checking payslips of staff supplied to GSS Group and also cross checked authenticity of payroll data by directly contacting the staff to ensure all staff are paid correctly.

### Recruitment

GSS Group ensures that strict compliance checks are carried out for all staff. We verify the identity of each worker and their right to work before their employment commences. We also have a dedicated people and culture team who audits that all staff are paid according to Security Industry Award or Employment Agreement to ensure they are paid correctly in accordance with the relevant award or agreement.

As part of our commitment to identify and eradicate slavery and human trafficking and to continuously assess



and address modern slavery risks, we have in place a process to undertake due diligence on our supply chain network to ensure compliance with legislative obligations, and such compliance forms part of our contractual relationship with suppliers. We will use best endeavors to procure from our suppliers by contract that full compliance with the Act must be achieved. We will use best endeavors to separately require that any actual or potential risk of breaching the Act that suppliers identify with in their own operations or supply chains are communicated to us. This information will be assessed and evaluated appropriately by senior members of GSS Group management on an ongoing basis.

## Supplier Code of Conduct

GSS Group regularly reviews and updates its Supplier Code of Conduct, which is a document that is relevant to all suppliers to GSS Group. Suppliers are expected to adhere to the GSS Group Supplier Code of Conduct, which includes specific reference to various matters including human rights, anti-bribery and corruption, and modern slavery and human trafficking, and suppliers must have in place a policy recognizing, respecting and protecting the human rights of their employees, those of their suppliers and business partners and the communities affected by the suppliers' operations.

GSS Group' position, which is mirrored in its Supplier Code of Conduct, is that:

- Employees should be free to choose to work for their employer and to leave the company upon reasonable notice.
- All employees must be provided with a clear contract of employment, which complies with local legislation.
- All employees must be treated in a fair and equal manner and with dignity and respect.
- Any form of discrimination, victimization, or harassment on any prescribed grounds under commonwealth, state or territory laws should be prohibited. This includes marital status, pregnancy, family responsibilities, sex (including gender reassignment), race (including colour, ethnic and national origin, nationality), disability, sexual orientation, religious belief, age, trade union activity or any other prescribed ground.
- All applicable laws and industry standards on employee wages, benefits, working hours and minimum age should be adhered to in all countries of operation, without any unauthorized deductions.
- All slavery and human trafficking laws must be complied with including, but not limited to, the provisions of the Act and any applicable state legislation. Suppliers must ensure their business operations are free from slavery and human trafficking practices whether in Australia or elsewhere, both internally and within their supply chains and other external business relationships

## Collaboration with clients

GSS Group tries its best to prevent any activity which involves unfair treatment of its staff by our own management or client personnel. Our team is our strength, and our management continuously gets feedback about workplace issues from our staff in our toolbox training meetings.

GSS Group is familiar with its obligation about ensuing to provide better and safe workplace environment which is free from any activity which falls in Modern Slavery.

## **Engagement with suppliers**

During 2024 GSS Group engaged with various companies that provide goods and services to GSS Group' office network. This involved providing copies of GSS Group' Supplier Code of Conduct to these suppliers and enquiring as to the modern slavery compliance practices and procedures. GSS Group has also updated and issued its new RFI documentation to prospective suppliers so that the prevention of modern slavery is specifically addressed as part of GSS Group' due diligence prior to contracting with a supplier.

## **Reviewing contractual documentation**

GSS Group' standard contract with client and suppliers includes specific references to modern slavery law compliance.

## **Ability for employees to raise concerns at work**

All GSS Group employees have access to dedicated channels through which they may voice concerns, either through local reporting mechanisms or through whistleblowing procedures. GSS Group is committed to protecting employees when disclosing malpractice and will ensure that all disclosures made in compliance with whistleblowing procedures will be treated confidentially and without fear of retaliation. It is by receiving and evaluating feedback and maintaining a culture of compliance that GSS Group can assess the effectiveness of its practices and procedures.

## **Training**

All staff within GSS Group are expected to comply with all laws and act in accordance with local guidelines and regulations and act with integrity and honesty. We have undertaken to review our policies and procedures to ensure our colleagues have access to any additional information and support they may require with regard to human trafficking, forced Labour, child Labour, servitude and slavery. All relevant employees in Australia will undertake training on modern slavery and human trafficking and this training is available to all employees to undertake.

To support GSS Group governance framework, a number of policies relevant to addressing and mitigating modern slavery risk are in place. In past two years we implemented following policies;

- Discrimination, Harassment and Bullying Prevention Policy
- Equal Employment Opportunity Policy
- Work Health and Safety Policy
- Fraud and Corruption Prevention Policy

## Assessing the effectiveness of the actions taken

Our assessment of the effectiveness of the tasks set out in our 2024 statement is as follows.

### **Dedicated training on modern slavery laws:**

All staff members of GSS Group were required to complete dedicated training on local modern slavery laws led by GSS Group senior operations team with the goal of offering digestible content that did not minimize the seriousness of the subject matter.

The training contained three elements: (1) a summary of GSS Group's actions taken to achieve compliance with the Laws; (2) a guide as to the content and location of GSS Group's modern slavery statement; and (3) video content published by the Australian Human Rights Institute specifically chosen for its concentration on the risks presented in security and other Labour hire services.

The training was positively received, Feedback from recipients was that this style of training allowed the content to cascade through further teams with ease.

### **Suppliers Compliance Check:**

GSS Group aims to conduct compliance check of any contractor engaged directly or indirectly in provision of its services to the clients.

As per standard operating procedure, suppliers are required to confirm their acceptance of and compliance with GSS Group's Supplier Code of Conduct and especially Labour hire suppliers are subject to a more rigorous process of completing an audit questionnaire, which requires suppliers to evaluate their own maturity in the space, their current practices and how they intend to increase this engagement.

Compliance Check includes:

- Whether, at this stage, the supplier is aware of the Act and whether they have obligations to comply with reporting requirements.
- All staff members are paid according to relevant Award or employment agreement.
- Commitment to comply with Labour Hire Licensing Authority.
- A commitment by the supplier to increase knowledge of and participation in the prevention of modern slavery in the next reporting year

No modern slavery breaches are disclosed by suppliers or otherwise identified by GSS till date.

### **Commitment to continued practices:**

In addition to the above, GSS Group continued to:

- Require potential suppliers to formally disclose their modern slavery risk mitigation strategies as part of GSS Group's RFI process.
- Regularly review our standard form contracts and activating updates when and if required.
- Hold an annual review process with members of senior management.

## Next Steps

Having assessed the effectiveness of the steps taken by our business to prevent modern slavery practices occurring at GSS Group and any prevalence of this within GSS Group's supply chain, GSS Group intends on taking the following steps over the next 12 months:

- Modern slavery has been added to our Risk Management Framework
- In-house training is being developed to build GSS Group's skills and capacity to understand, recognize and respond to modern slavery risks.
- At the next review of the GSS Group's Procurement Guidelines, we will closely consider and further embed risk mitigation for modern slavery.
- When each internal policy undergoes its scheduled review, we will seek, consider and embed opportunities to include and strengthen the GSS Group's commitment to addressing and mitigating modern slavery risks.
- GSS Group will continue to monitor our supply chains and take pre-emptive action when a supplier, or potential supplier, is identified as 'at risk' for modern slavery.

## Effectiveness of GSS's Steps to Ensure Compliance

We will continue to regularly undertake, and review the effectiveness, of our current standard operating procedures regarding compliance with the Act, being to:

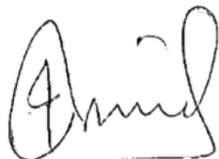
- Continuing annual compliance audits of GSS Group's suppliers.
- Require potential suppliers to formally disclose their modern slavery risk mitigation strategies as part of GSS Group's RFI process.
- Increase the number of GSS Group employees who are provided with dedicated training on modern slavery laws.
- Monthly Statements signed by contractors confirming their compliance to labour laws.
- Regularly review our standard form contracts and actioning updates when and if required.
- Engagement with more efficient chartered accountant firm for assurance to compliance with labour laws.
- Hold an annual review process with members of senior management.

**This statement is made pursuant to the Act and constitutes GSS Group's slavery and human trafficking statement in respect of the 2024 reporting year and is approved by the principal governing body of GSS Group, headed by Managing Director.**

**M. IMRAN MUKHTAR**

*Managing Director*

20/03/2025

A handwritten signature in black ink, appearing to read "Imran", written over a horizontal line.