



Modern Slavery Statement for Financial Year 2019-2020

1. SECURE PARKING PTY LTD MODERN SLAVERY STATEMENT

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) by Secure Parking Pty Ltd as trustee of the Secure Kings Unit Trust (**Secure Parking**) in respect of Secure Parking and its related bodies corporate (**Secure Parking Group**) and relates to the Australian financial year 1 October 2019 to 30 September 2020.

Modern slavery encompasses slavery, servitude, forced labour, human trafficking, forced marriage, child labour and debt bondage. Secure Parking has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

This document explains the steps Secure Parking has taken to prevent, detect and respond to slavery and human trafficking within our business and throughout our supply chain.

2. ABOUT OUR BUSINESS

Secure Parking is a leading manager and operator of commercial car parks and operates nationally across Australia. We market our services to private and government owners of commercial car parks as well as end users.

Secure Parking is based in Sydney, Australia, with associated offices in New Zealand and an operations centre located in the Philippines operating under the Secure Parking Group. We employ over 600 employees across our offices and sites.

Secure Parking values human rights and is committed to ensuring that all business is conducted according to ethical, professional and legal standards, and in a fair and honest manner. Secure Parking is committed to the fight against slavery and human trafficking. Secure Parking aims to achieve our goals whilst supporting and fostering development in the communities in which it operates.

Secure Parking is committed to ensuring that its corporate culture, in all offices and operations in Australia, discourages conduct that violates any Modern Slavery criminal offences contained in Divisions 270 and 271 of the *Criminal Code 1995* (Cth) (the **Code**) and any Modern Slavery laws, including the *Modern Slavery Act 2018* (Cth) (together, **Modern Slavery Laws**). Secure Parking will immediately terminate the employment of any employee, or its association with, any agent, consultant, contractor or representative, who offends any Modern Slavery Law or does not assist Secure Parking with Modern Slavery compliance.

Our procurement activities are overseen from our head office in Sydney. The contractors and suppliers for Secure Parking's Australian business are predominately Australian based. We expect all suppliers and contractors to comply with the Modern Slavery Act.

3. SECURE PARKING'S POLICIES AND PRINCIPLES

Secure Parking has various policies which assist in managing sustainability and human rights, including the following:

- (a) **Modern Slavery Policy:** This policy sets out Secure Parking's stance on modern slavery and explains how employees can identify instances of modern slavery and where they can go for help.



- (b) **Human Resource Policy:** We operate a robust recruitment policy, including the eligibility to work in Australia checks for all employees to safeguard against human trafficking.
- (c) **Employee Code of Conduct:** This document requires all Secure Parking employees to act in accordance with all relevant national and international laws and to abide by the specific codes of practice; e.g. in relation to anti-slavery measures, bribery and equality of opportunity.
- (d) **Whistleblower Protection Policy:** This policy allows all Secure Parking employees to report anonymously matters relating to breach of the law, breaches of policy, fraudulent activities and activities which may endanger the health of internal and external stakeholders.

Secure Parking's employees are continuously required to familiarise themselves in our policies, including those related to human rights, and our company values.

4. **SECURE PARKING'S RISK MANAGEMENT AND DUE DILIGENCE PROCESSES**

Secure Parking operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become preferred suppliers. Our Modern Slavery Policy is part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts the law in relation to the Modern Slavery Act.

In addition, as part of our contract with suppliers, we require that they confirm to us that:

- (a) they comply with modern slavery laws.
- (b) (For Australian based suppliers): they pay their employees at least the national minimum wage.
- (c) (For international suppliers, e.g. Philippines): they pay their employees any prevailing minimum wage applicable within their country of operations.

5. **ASSESSING AND MANAGING RISK**

At Secure Parking we are continually monitoring our risk profile and aim to have appropriate controls in place. We consider a number of factors increase the risk of modern slavery, for example geographic location, the types of goods or services being provided, and existing local human rights protections offered to workers, businesses partnership and types of transactions.

We aim to continue to identify our key areas of risk and develop programs which resolve or mitigate such risks to the best of our abilities. Our investigations involve due diligence of all new suppliers, detailed request for proposals and their policies and processes in relation to modern slavery as well as negotiation of contractual provisions for compliance with modern slavery laws. At the same time we will continue to conduct internal assurance through a mature risk governance framework.

6. **OUR TRAINING**

A key part of our anti-slavery and anti-human trafficking strategy is to promote workplace cultural changes through training. Last financial year we:

- (a) Ran a training seminar to key staff involved in procurement, including Secure parking's management and leadership team;



- (b) Made it mandatory for all staff to familiarise themselves with Secure Parking's Modern Slavery Policy and Anti-Modern Slavery Compliance Manual.

7. **LOOKING AHEAD**

Secure Parking recognises that tackling modern slavery requires a continuing year-on-year commitment. In FY21, we will continue to collaborate with internal and external stakeholders to address our own modern slavery risks, as well as to encourage progress in domestic policy forums.

We will focus on:

1. revising our sourcing framework including by consolidating and reducing the number of suppliers with a focus on ensuring adherence to the Modern Slavery Act; and
2. developing a questionnaire for completion by our suppliers to improve compliance reporting in our supply chains.

This statement was approved by the Board of Secure Parking Pty Ltd in their capacity as principal governing body of Secure Parking Pty Ltd on 23 March 2021.

This statement is signed by Peter Anson in his role as Chief Executive Officer of Secure Parking Pty Ltd on 23 March 2021.

A handwritten signature in black ink, appearing to be "Peter Anson", written over a horizontal line.

Signed: