



Modern Slavery Statement for Financial Year 2021-2022

1. INTRODUCTION

This Modern Slavery Statement is made pursuant to section 14 of the *Modern Slavery Act 2018* (Cth) (the Act) by Park24 Australia Pty Ltd on behalf of the following reporting entities (Group):

Secure Parking Pty Ltd as trustee of the Secure Kings Unit Trust (Secure Parking)

Park24 Australia Pty Ltd (Park24AU)

and relates to the Australian financial year 1 October 2021 to 30 September 2022.

Modern slavery encompasses slavery, servitude, forced labour, human trafficking, forced marriage, child labour and debt bondage. The Group 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 the Group has taken to prevent, detect and respond to slavery and human trafficking within our business and throughout our supply chain.

2. CONSULTATION WITH RELATED ENTITIES

This joint Statement has been prepared and issued by Park24AU on behalf of the Group which share similar procedures and systems and unless specified, all measures described in this Statement are applicable to the Group.

Over the FY22 reporting period, all reporting entities controlled by the Group have been consulted and engaged with in the preparation of this Statement.

3. REPORTING ENTITIES' STRUCTURE AND OPERATIONS

The Group

The Group 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. The Group is committed to the fight against slavery and human trafficking. The Group aims to achieve our goals whilst supporting and fostering development in the communities in which it operates.

The Group 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 Act (together, **Modern Slavery Laws**). The Group, on becoming aware of; 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 the Group with Modern Slavery compliance.

Park24AU

Park24AU was incorporated on 20 December 2016, and is the 100% parent company of Secure Parking. It is a non-operational holding entity in Australia, and is itself held by Park24 Co., Ltd, the Group's ultimate holding company based in Japan.



Other than mainly the auditing and accounting services, Park24AU does not engage with any suppliers and is merely an intermediary company between Secure Parking and Park24 Co., Ltd.

Secure Parking

Secure Parking is a leading manager and operator of commercial car parks and operates nationally across Australia. Secure Parking markets 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.

Secure Parking employs over 900 employees across its offices and sites.

Secure Parking's procurement activities are overseen from its head office in Sydney. The contractors and suppliers for Secure Parking's Australian business are predominately Australian based. Secure Parking expects all suppliers and contractors to comply with the Act.

4. **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:** Secure Parking operates 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 their policies, including those related to human rights, and the Groups company values.

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

The Group utilises common business service suppliers, e.g auditor, accounting firm and banks, etc, however given Park24AU are not actively trading, they rely on Secure Parking's due diligence and risk management procedures when engaging these entities to meet its requirements under the Act.



Secure Parking operates a supplier policy and maintains a preferred supplier list. Secure Parking conducts due diligence on all suppliers before allowing them to become preferred suppliers in order to assess and identify modern slavery related risks. Secure Parking's Modern Slavery Policy is part of its contract with all suppliers and suppliers are required to confirm that no part of its business operations contradicts the law in relation to the Act.

At time of engagement of all of Secure Parking direct suppliers it maps the supplier's location, the anticipated monetary spend, type of products/services to be provided and assesses the severity/likelihood of the risk of modern slavery practices.

In addition, as part of Secure Parking's contract with suppliers, it requires that the suppliers confirm to them that:

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

During the reporting period, Secure Parking assessed that its local operations which are handled by employees directly employed by it were of the lowest risk. Currently Secure Parking's highest risk area is offshore labour organised by third party service providers in the Philippines.

6. ASSESSING AND MANAGING RISK

FY22, Secure Parking confirmed that its suppliers/contractors operated their business in compliance with the Act.

Secure Parking are continually monitoring its risk profile and aim to have appropriate controls in place. Secure Parking considers the following as factors which increase the risk of modern slavery;

- (a) geographic location;
- (b) the types of goods or services being provided; and
- (c) existing local human rights protections offered to workers, businesses partnership and types of transactions.

Secure Parking aims to continue to identify its key areas of risk and develop programs which resolve or mitigate such risks to the best of our abilities. Secure Parking 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, Secure Parking will continue to conduct internal assurance through a mature risk governance framework.

Secure Parking recognises that its review and assessment of its policies and procedures in respect to compliance with the Act and mitigation of the risks of modern slavery practices is an ongoing obligation and evolving process. While at this early stage it is difficult to assess



adequately the effectiveness of the measures it has put in place Secure Parking is committed to the process and continued improvement its actions to deal with the risk of modern slavery.

7. OUR TRAINING

A key part of the Group's anti-slavery and anti-human trafficking strategy is to promote workplace cultural changes through training. In FY22 Secure Parking:

- (a) ran a training seminar to key staff involved in procurement, including its management and leadership team;
- (b) made it mandatory for all staff to familiarise themselves with Secure Parking's Modern Slavery Policy

8. ASSESSMENT OF THE EFFECTIVENESS OF RISK MANAGEMENT

The Group recognises that tackling modern slavery requires a continuing year-on-year commitment and recognises the inherent risks hidden behind the veil of its supplies. In FY23, 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 Act;
- 2. conducting ongoing education and training forums as part of our compliance program to further understand the risk which may occur; and
- 3. developing an induction questionnaire for completion by our suppliers/contractors to improve compliance reporting in our supply chains.

This Modern Slavery Statement was approved by the Boards of Park24AU and Secure Parking in their capacity as principal governing bodies of the Group on 23 March 2023.

This statement is signed by Hiroyasu Matsui in his role as Director of Park24AU and Secure Parking on 23 March 2023.

Signed: *Hiroyasu Matsui*