

Challenger Services Group

Modern Slavery Statement

Reporting Period 2024 – 2025



**CHALLENGER
SERVICES GROUP**

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This is the second Modern Slavery Statement for Challenger Services Group (“CSG”), prepared in accordance with the Modern Slavery Act 2018 (Cth).

It outlines the progress we have made over the past reporting period (2024-2025) and the steps we continue to take to identify, manage, and mitigate the specific risks of modern slavery in our operations and supply chain.

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Challenger Services Group Introduction

At CSG we believe in contributing to the creation of a fair and inclusive society, free of exploitation, where every individual can strive to achieve their full potential.

Our purpose is to create safe, clean and protected environments for people to work, travel and live in with confidence, driven by our core beliefs and values:

Give it a Go.

Back Each Other.

Own it.

Our purpose and values cement our commitment to acting ethically, with integrity and transparency and to implementing effective systems and controls to safeguard against any form of modern slavery.

Specifically, our core belief in **Owning it** captures our emphasis on accountability and diligence in our supply chain, while our belief on **Backing Each Other** reinforces our duty and commitment to protecting vulnerable people and upholding the safe and protected environments we strive to deliver.

We expect our suppliers to hold their own suppliers and everyone in their supply chain to the same high standards.

Challenger Structure, Operations & Supply Chain

Challenger is a national leading provider of facility services, commercial cleaning, hospitality, and security services.

We operate throughout Australia, servicing diverse customers across six core market segments including:

- **Commercial Buildings & Retail Precincts,**
- **Hotels & other Hospitality Venues,**
- **Food Manufacturing & Food Production Facilities,**
- **Government (*including Transport Infrastructure*),**
- **Aged Care & Education Providers, and**
- **Technology Providers.**



Our Reporting Entity & Structure

This Statement covers the activities of the following entities, all of which are wholly owned subsidiaries of the reporting entity, Challenger Services Group Pty Ltd (ABN 60 610 657 479):

	CHALLENGER SERVICES	Challenger Services Pty Ltd (Commercial Cleaning, Food Manufacturing & Food Production)
	CHALLENGER SECURITY	Challenger Security Pty Ltd (Security Services)
	CHALLENGER HOSPITALITY	Challenger Hospitality Pty Ltd (Hospitality Services)
	TURBO CHUTE	Turbo Chute Australia Pty Ltd (Garbage Chute Cleaning)

CHS MNG Pty Ltd (Head Office Staff Division)



Challenger Services Group Governance

Our commitment to addressing modern slavery is overseen by the CSG Modern Slavery Working Group, which is made up of the CSG Executive Leadership Team.

This group, led by our Managing Director and supported by our Chief Executive Officer, is responsible for overseeing the organisation's response to combating modern slavery risks.

Additionally, our divisional management teams manage and oversee any material modern slavery risks in accordance with the Challenger Risk Management Framework.

Risks of Modern Slavery Practices in Challenger Services Group Operations & Supply Chains

We recognise that the cleaning and facilities management industries in particular, are considered a high risk for modern slavery.

To reduce the risk of vulnerable group exploitation, our services are primarily self-delivered in Australia, which has a low prevalence of modern slavery (*Global Slavery Index 2018*) and a strong regulatory environment.

However, risks persist in our supply chain, particularly those involving low-skilled, manual work, and sourcing from areas with potentially less stringent oversight.

Our focus remains on the heightened risk areas:

1. Contracted Labour & Operations



The highest risk is within our Australian contracted labour supply chain, specifically our cleaning and security subcontractors. Although we utilise subcontracted services to assist with serge requirements and specialised services only, there are inherent risks in outsourcing labour. These risks stem from, commercial pressure to minimise costs, and the vulnerability of the workforce (which often includes temporary or migrant workers). We acknowledge that the industry has a potential for wage exploitation, sham contracting and excessive hours, all being strong indicators that modern slavery could be present in these high-risk areas.

2. Chemical Suppliers, Uniforms & PPE



The complexity of these supply chains in potentially high-risk jurisdictions.

We believe the risk of causing, contributing, or being directly linked to modern slavery in our own direct employment operations remains minimal.

Actions Taken to Assess & Address Modern Slavery Risks (2024–2025 Progress)

Our actions have built upon the foundation of our inaugural statement, focusing on continuous monitoring and deeper supply chain assurance, with a specific emphasis this year on the oversight of contracted labour.

Assessment Area	Previous Action (2023–2024 MSS)	Progress and Action Taken in 2024–2025
Governance & Policy	Commitment outlined in CSG Code of Conduct and 14 supporting policies.	Maintained and re-communicated all existing policies. The Whistleblower Policy was actively promoted to increase reporting confidence across the business and supply chain.
Contracted Labour Oversight	Contractual compliance clauses were included in subcontractor agreements.	Mandated payroll verification: Implemented a new protocol requiring high-risk cleaning and security subcontractors to provide periodic evidence (<i>e.g., redacted payroll data and declarations</i>) confirming Award-compliant and NES compliant payments.
Supplier Engagement	Issuance of Modern Slavery Statement and Supplier Questionnaire; due diligence on new suppliers.	Increased coverage of the Modern Slavery Supplier Questionnaire to include 100% of our Tier 1 Suppliers across all categories. Formalised the annual audit process for high-value/ high-risk suppliers to include specific on-site safety and payroll and work entitlement verification checks.

Assessment Area	Previous Action (2023–2024 MSS)	Progress and Action Taken in 2024–2025
Training & Awareness	Modern slavery awareness training for all Executive Leadership Team members and procurement staff.	Expanded the training program to include all new employees in procurement and operations supervisory roles. Conducted a targeted workshop for the CSG Modern Slavery Working Group on emerging global supply chain risks.
Risk Identification	Analysis of supply chain to identify high-risk categories (<i>Contracted Labour and Chemicals/ Uniforms/ PPE</i>).	Completed a deeper assessment for the top 15 highest spend suppliers across all categories combined.
Remediation	Established protocol for breach and remedy notice, suspension, termination, and regulatory reporting.	The remediation protocol was formally documented and incorporated into the Operations Manual. Crucially, our Whistleblower Policy was promoted directly to contracted workers (<i>where feasible</i>) to ensure an accessible grievance mechanism for exploitation.



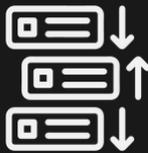
Industry Collaboration & Data Integration

During the 2024–2025 reporting period, CSG actively participated as a member of the **Informed 365 Property Platform Collaboration**. This dedicated industry working group, which met monthly throughout the year, is focused on advancing best practice for assessing and addressing modern slavery risks across the property and facilities sector.

Our participation has allowed us to strategically leverage industry insights to refine our own risk management processes:



Risk Metrics & Due Diligence: We contributed to, and benefitted from, discussions on the use of **Supplier Assessment Questionnaire (SAQ) data points** as effective lead and lag indicators for human rights risks. This enhanced our understanding of high-risk areas and informed improvements to our due diligence protocols for high-risk suppliers.



Supplier Engagement: We participated in collaborative initiatives focused on improving supplier engagement rates and addressing "supplier fatigue." Discussions on the launch of the Informed 365 'Solving the Puzzle of Supplier Engagement' resource helped us optimise our internal communication strategy, leading to more accurate and meaningful supplier responses.



Best Practice Reporting: Through guest speakers from the Attorney-General's Department and the NSW Anti-slavery Commissioner's Office, we gained up-to-date insight into legislative changes and reporting trends, ensuring our second Modern Slavery Statement aligns with regulatory expectations and best practice.



Continuous Improvement Pathways: We applied knowledge gained from the collaboration to support suppliers in identifying their own risk areas. Key topics discussed, such as the creation of **Continuous Improvement Pathways (CIPs)**, directly informed our strategy for helping non-compliant suppliers raise their standards before escalation is required.

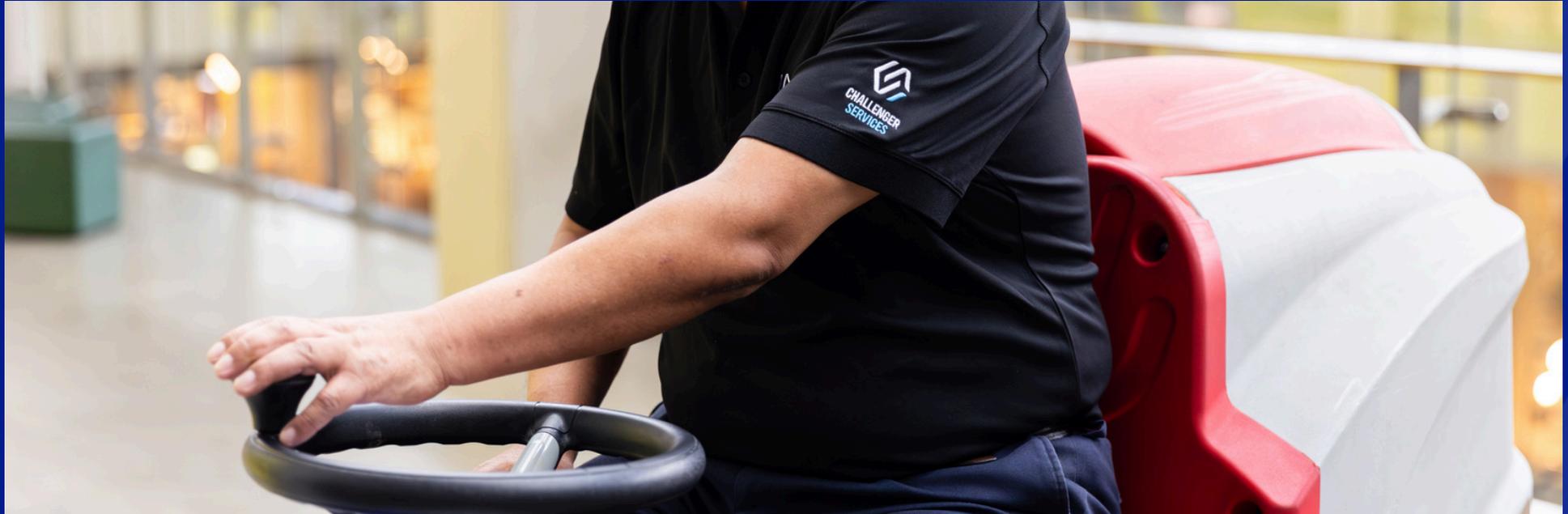


Data Collection & Analytics: We utilised the Informed 365 data and analytics platform to aggregate and analyse data from surveys received from our suppliers to identify areas of risk, any noncompliance (of which there was none reported) and areas of improvement.

Analysis of Suppliers

To quantify and manage our risk exposure, we have analysed our supply chain with a specific focus on the top 15 Suppliers based on total amounts spent.

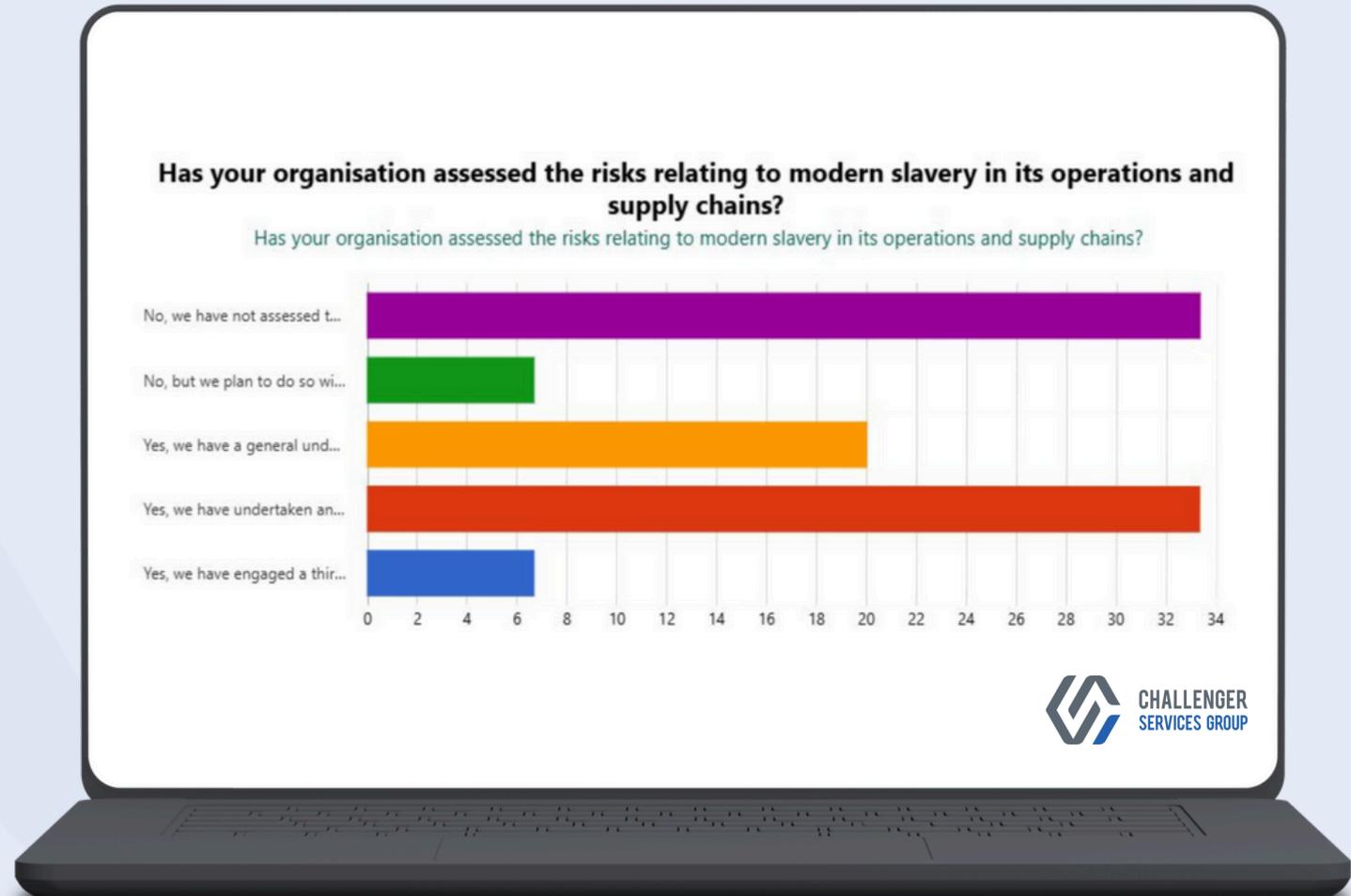
Supplier Category	Number of Suppliers	Modern Slavery Risk Profile (High, Medium, Low)	Key Action Taken in 2024-2025
Cleaning & Facilities Subcontractors	14	High	Increased contractual assurance and payroll checks.
Chemicals, Uniform & PPE Providers	1	High	Conducted targeted Tier 1 due diligence.



Analysis of Suppliers

Below is a graphic illustration of a sample of the key data collected and analysed from our top 15 suppliers in relation to:

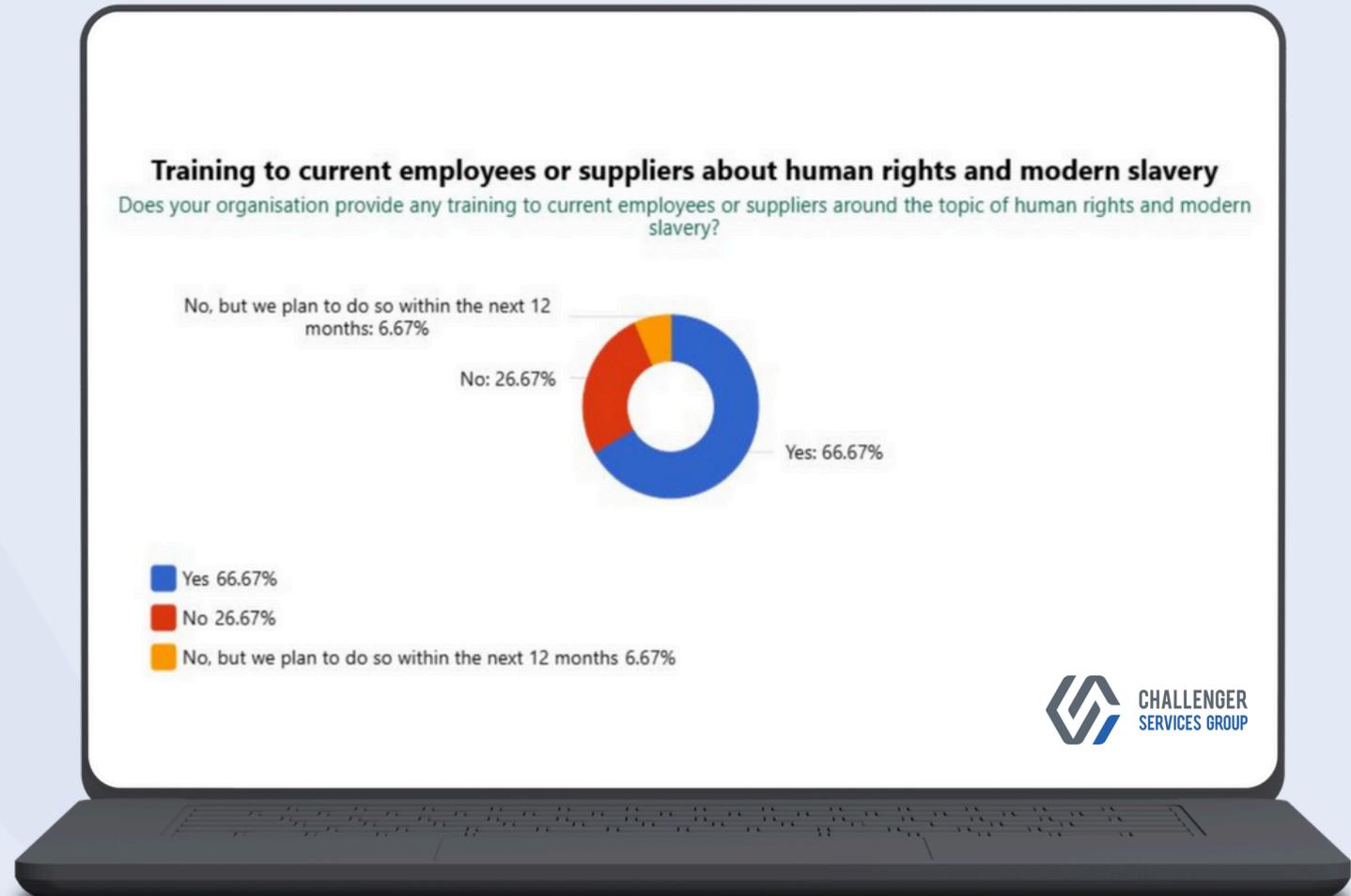
How the suppliers have assessed the risks relating to modern slavery in their operations:



Analysis of Suppliers

Below is a graphic illustration of a sample of the key data collected and analysed from our top 15 suppliers in relation to:

The prevalence of training provided by the key suppliers to their workforce in relation to modern slavery.



Assessing Effectiveness & Future Actions

We assess the effectiveness of our modern slavery risk mitigation processes through the rate of compliance with our Supplier Questionnaire, the findings from our annual audit process, and the absence of substantiated reports through our Whistleblower Policy. Our remediation process, which includes immediate suspension of services and termination for non-compliance, remains our key enforcement mechanism.

We recognise that eradicating modern slavery requires dedication to make a positive difference to people's lives. Our proposed action plan for the next reporting period (2025-2026) is as follows:

Focus Area	Proposed Action Plan for 2025-2026
Risk Assurance & Diligence	Develop and implement a Risk Heatmap Tool to better integrate modern slavery risk data into procurement decisions, moving beyond simple spend-based assessment.
Training & Culture	Roll out a mandatory, simplified modern slavery training module to a significant portion of our 1200+ employees and associates, not just Leadership and Procurement, to foster a company-wide awareness culture.
Supplier Engagement	Introduce a formal Supplier Code of Conduct that explicitly incorporates all modern slavery and ethical sourcing requirements, requiring all high-risk suppliers to formally sign adherence.
Data & Transparency	Aim to reach 100% completion of the Modern Slavery Supplier Questionnaire for all Tier 1 suppliers in the Cleaning & Facilities Subcontractors category.
Remediation & Collaboration	Continue to work with Informed 365 to review our current remediation process, ensuring it aligns with global best practice for supporting potential victims.

Consultation & Approval Process

This Statement was developed through ongoing consultation, including engagement with the CSG Modern Slavery Working Group and various levels of management across the business units. The sole director/ secretary of Challenger Services Group Pty Ltd is also the sole director/ secretary of each of the subsidiary entities listed in section 2.1, ensuring all entities speak with one single voice and vision on the issue of modern slavery.

The CEO and CSG Executive Leadership Team have been involved in the compilation and endorsement of this Statement. This Statement was approved on 12/12/2025 and signed by the Managing Director.



Vadim Gurevich

Managing Director
Challenger Services Group Pty Ltd
Date: 12/12/2025

A handwritten signature in white ink, appearing to be 'V. Gurevich', written over a faint blue background.



**CHALLENGER
SERVICES GROUP**

Questions or Concerns

We value all feedback. Please forward any comments on this statement or requests for additional information to:
compliance@csgroup.com.au