

Modern Slavery Statement

Reporting Period
1 April 2024 – 31 March 2025



Millennium Services Group Pty Ltd
ABN 11 607 926 787
MS Journey Pty Ltd
ACN 673 801 673
MS Operations Pty Ltd
ACN 673 801 262

Board Approval of Modern Slavery Statement.

This Joint Modern Slavery Statement has been prepared pursuant to the reporting requirements under the Modern Slavery Act 2018 ("the Act") and approved by the Boards of:

- Millennium Services Group Pty Ltd
- MS Journey Pty Ltd
- MS Operations Pty Ltd

in their capacity as the reporting entities' principal governing bodies on 31.07.2025

The contents of this Statement have been reviewed and confirmed as accurate by a duly authorised person, as required under the Act.

This statement is signed by Royce Galea in his role as the Director of Millennium Services Group Pty Ltd on 31.07.2025



Royce Galea

Director, Millennium Services Group Pty Ltd

This statement is signed by Chow Kin Hoong Andrew in his role as the Director of MS Journey Pty Ltd and MS Operations Pty Ltd on 31.07.2025



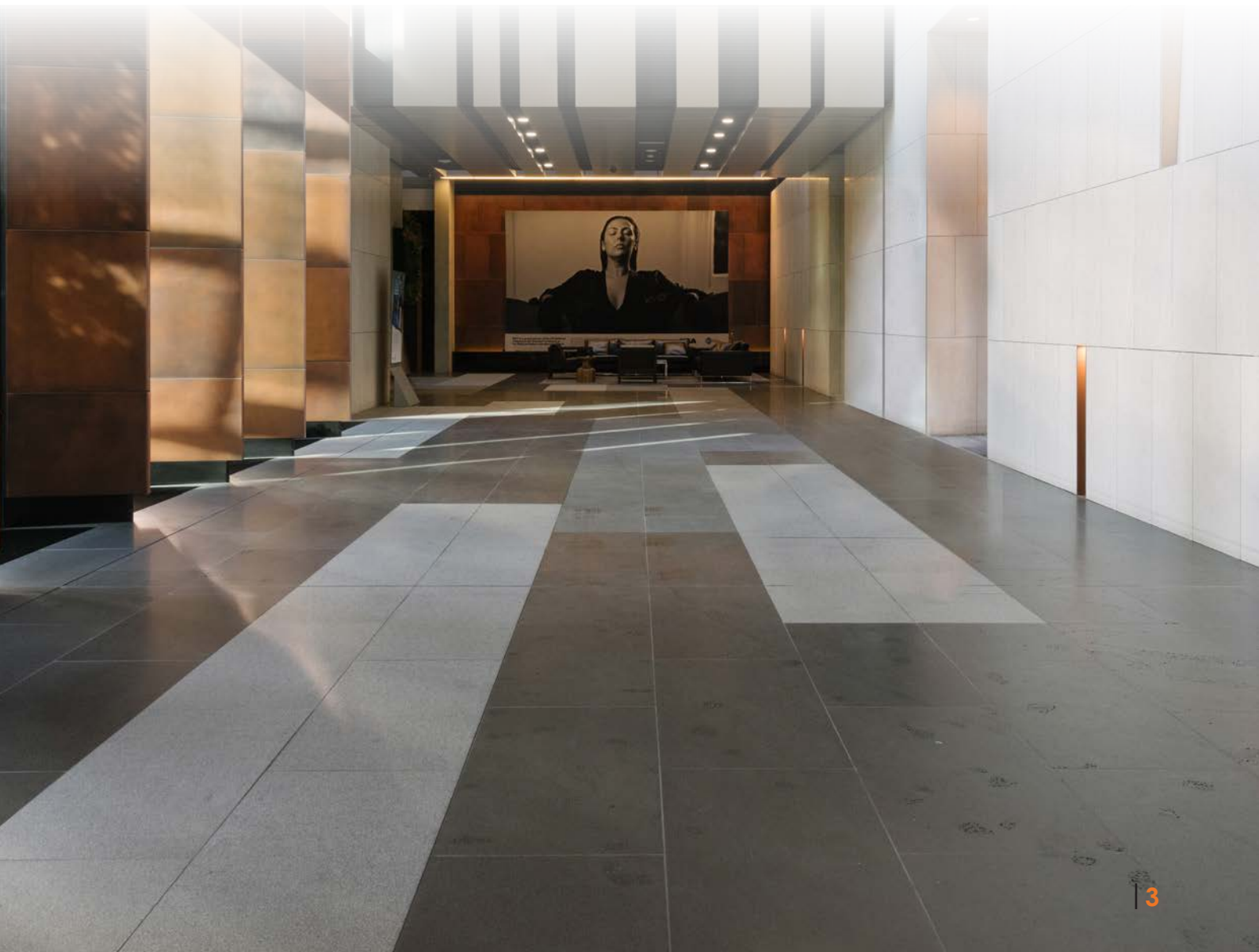
Chow Kin Hoong Andrew

Director, MS Journey Pty Ltd

Director, MS Operations Pty Ltd

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CEO Message.

The 2024–2025 reporting period has been a transformative year for Millennium Services Group. It marked the first time our modern slavery obligations extended to two new non-operational Australian holding companies—**MS Journey Pty Ltd** and **MS Operations Pty Ltd**—following the Group's acquisition by **SoffBank Robotics Singapore Pte Ltd** in 2024. Despite this significant structural change, Millennium remained firmly committed to strengthening and maturing our modern slavery response.



This year, we made measurable advances in risk mitigation across both our operations and supply chain. A major step forward was the implementation of our enhanced **contractor risk management framework through the Donesafe platform**. This system has significantly improved transparency and oversight of subcontracted labour—a key modern slavery risk area in our industry. Contractors are now subject to rigorous pre-engagement vetting, and modern slavery safeguards are embedded throughout their engagement lifecycle.

We also deepened our **external partnerships and certifications**. Millennium was proud to support **ISPT** in achieving **Gold Portfolio Certification** under the **Cleaning Accountability Framework (CAF)**, and we played a pivotal role in delivering ISPT's national **Worker Engagement Program** across 25 sites. Furthermore, **nine external audits** of our security services workforce, conducted using the **WCA-HR standards**, found no red flags—demonstrating the practical effectiveness of our risk management systems.

Importantly, Millennium identified and immediately responded to a **red flag incident** involving potentially coercive behaviour and fraudulent timekeeping. In response, we upgraded time and attendance systems across all client sites with advanced facial likeness analysis technology to detect the use of spoofed images or videos, appointed new site-level leadership, and delivered targeted retraining. These decisive actions demonstrate our ability to detect and remediate risk in real-time, in line with our **zero-tolerance approach to exploitation**.

To guide ongoing improvements, Millennium's **People and Risk Committee** has approved a new **Modern Slavery Strategy** grounded in ten core pillars—from governance and supplier engagement to grievance mechanisms and survivor support. This framework will drive our efforts into 2026 and beyond.

I am proud of the commitment shown by our teams and partners. We remain focused on the **dignity, rights, and protections of all workers**—across our workforce, our suppliers, and our industry.



Royce Galea
Chief Executive Officer,
Millennium Services Group



Operations Structure Consultation.

Our Operations, Corporate Structure and Consultation.

1. This Statement relates to Millennium Services Group Pty Ltd (ABN 11 607 926 787) (referred to throughout as “Millennium”, “we” and “our”), which has been a reporting entity since the Modern Slavery Act’s commencement. This is our fifth consecutive Statement.
2. For the first time, this is also a Joint Statement under the Act, and covers Millennium’s Australian holding companies: **MS Journey Pty Ltd** and **MS Operations Pty Ltd**. (“Millennium’s Australian Holding Companies”). This is the first time the Australian Holding Companies (which were only created in December 2023), have reported under the Act. These companies are non-operational, with no staff or suppliers.
3. In May 2024, Millennium Services Group Pty Ltd was acquired, via a complete transfer of ownership to the Australian Holding Companies, by a Singaporean robotics company – SoftBank Robotics Singapore Pte Ltd (which is a subsidiary of a publicly listed Japanese company). As a result, our modern slavery reporting now extends to these two new holding companies that record the consolidated revenue in Australia.
4. This change to Millennium’s ownership also means that its corporate accounting has shifted to the foreign financial year (April 2024 – March 2025), which alters its reporting period under the Act also. To ensure that there is no gap in reporting with this shift, this Statement effectively covers the period from January 2024 to March 2025, as our previous Statement related to the calendar year ending 31 December 2023.¹
5. Millennium’s core operations and key supply chain characteristics remain consistent with previous reporting periods (except where otherwise noted in this Statement). Substantive similarities between descriptions in this Statement and previous Statements reflect the continuing currency of the relevant information.
6. As with previous years, we have also chosen to focus areas of emphasis and more detailed description in this Statement (whilst still addressing the reporting criteria), to highlight where our overall modern slavery response framework has improved, evolved and been further refined for greater practical impact for potentially vulnerable segments of our workforce.

¹ Millennium has adopted this approach following engagement with the Australian Government’s Attorney-General’s Department, that it submit a statement covering 1 January 2024 – 31 March 2025.

7. Millennium is a leading provider of commercial cleaning, security and integrated property services to a diverse spectrum of businesses spanning across



Australia and New Zealand.

8. Our services maintain, protect and enhance more than 800 locations (ranging from retail properties, food courts, schools and universities, distributions centres and airports), and assist clients operating in a range of sectors
Retail | Commercial | Government | Hospitality | Education | Industrial

9. In addition to commercial cleaning and security, our integrated property services include concierge, hygiene and waste management, and maintenance /facility support.



Cleaning



Security



Integrated Property Services

“ Integration of advanced technology to enhance the efficiency and effectiveness of commercial cleaning. ”

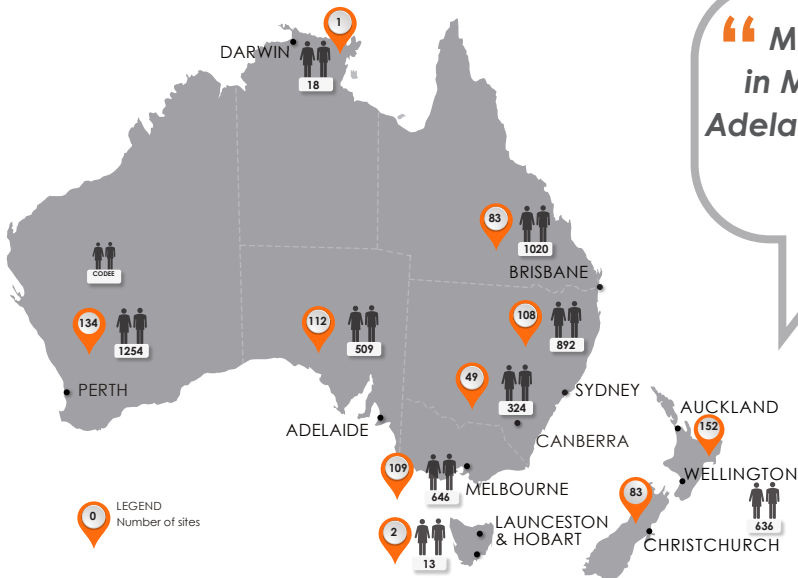


10. A defining characteristic of our operations is leading integration of advanced technology to enhance the efficiency and effectiveness of commercial cleaning.

11. Our state of the art workforce guidance and tracking system uses data from up to 80 sensors (depending on property size) to track employee movement across key areas including restrooms, parent rooms, mall spaces, bins, and docks. This enables targeted cleaning, optimises waste management, and supports autonomous night and car park cleaning, significantly reducing water, energy, and lighting costs.

12. Millennium's other technology-based innovations in commercial cleaning and security services include:

- **HSI Donesafe** –a single source solution to unify all safety, risk and quality management functions under one platform to manage risk and compliance
- **Humanforce** - Our time and attendance platform records workforce compliance data and enables timely messaging and facial recognition
- **Millennium People Hub (ELMO)** – A unified HRIS software platform that centralises essential HR functions including recording employee data, payroll, recruitment and training into a single location.
- **SoftBank Robotics** - State-of-the-art autonomous robotic hard and soft floor cleaning robotics.
- **Bin and Bathroom Sensors** - Usage counters and bin sensors optimise cleaning efficiency based on real-time data.
- **Operator XR** - Immersive and cutting-edge VR training platform providing realistic, scenario-based learning for staff.



“ Millennium has offices located in Melbourne, Sydney, Brisbane, Adelaide, Perth, Hobart, Canberra, Auckland, and Christchurch. ”

- 13. Millennium has offices located in Melbourne, Sydney, Brisbane, Adelaide, Perth, Hobart, Canberra, Auckland, and Christchurch.
- 14. Below is a snapshot of key operational statistics highlighting the efforts of our team during the reporting period:



Cleaning Statistics

Number of people who transit the Centres we clean each week.	13,500,000
Sqm of mall space cleaned each week.	1,900,000
Carparks and Driveways cleaned weekly.	420,000

Security Daily Centre Statistics

Sqm of mall spaces patrolled daily	1.4M
Alarms monitored 24/7	1,250
Doors locked and checked per night	4,350
Incident responses per annum	55,500
Mall patrol rotations completed per annum	6.5M





Professional Cleaners
4,101



Security Officers
733



Professional and Managerial Staff
124

The Millennium Team.

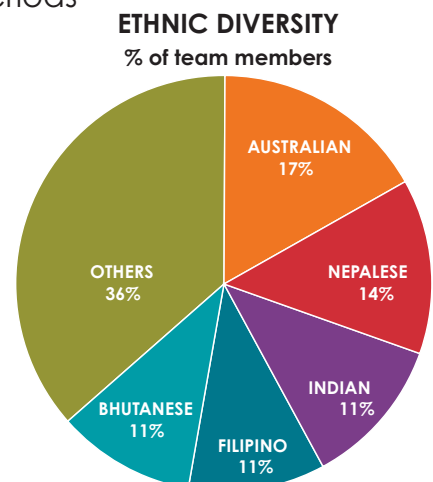
15. Millennium's operations depend on a total workforce of 4,958 team members across Australia and New Zealand. This includes 4,101 individuals working as professional cleaners, 733 security officers and 124 professional and managerial staff. A breakdown of staff by employee type is set out in the table below.

Full-time 1,299	Part-time 3054	Casual Employees 605
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EMPLOYEE TYPES

16. Our workforce continues to be defined by multicultural diversity. As has been the case since we began operating in 2003, Millennium remains committed to providing fulfilling job opportunities for people with disabilities, new immigrants, people returning to work from periods of unemployment, and First Nations people.

17. Whilst these are core business characteristics of Millennium that we embrace and celebrate, we recognise that it also creates specific challenges and responsibilities in relation to our overall modern slavery risks and response. The pie chart set out the ethnic diversity of our workforce for the reporting period.



18. In addition to our directly employed team members, and consistent with a virtually universal industry trend, a contracted workforce also plays a vital role in enabling Millennium to efficiently and effectively provide some clients with appropriately tailored cleaning, security and integrated property services. We recognise the key risk considerations and practical mitigation measures that are inherent with this core industry characteristic, and this has been a significant focal point for our overall modern slavery response this reporting period.
19. Relevant licenses and certification that Millennium continues to maintain include state-based initiatives such as ACT Secure Local Jobs Code: (Renewed in August 2024) and VIC Fair Jobs Code – (Pre-Assessment Certificate), Labour Hire Authority (Victoria), Registered Labour Hire Provider (QLD). We also maintain leading external recognition, including:
- Property Council of Australia
 - Cleaning Accountability Framework
 - Ecovadis
 - Australian Security Industry Association Limited (ASIAL) Platinum

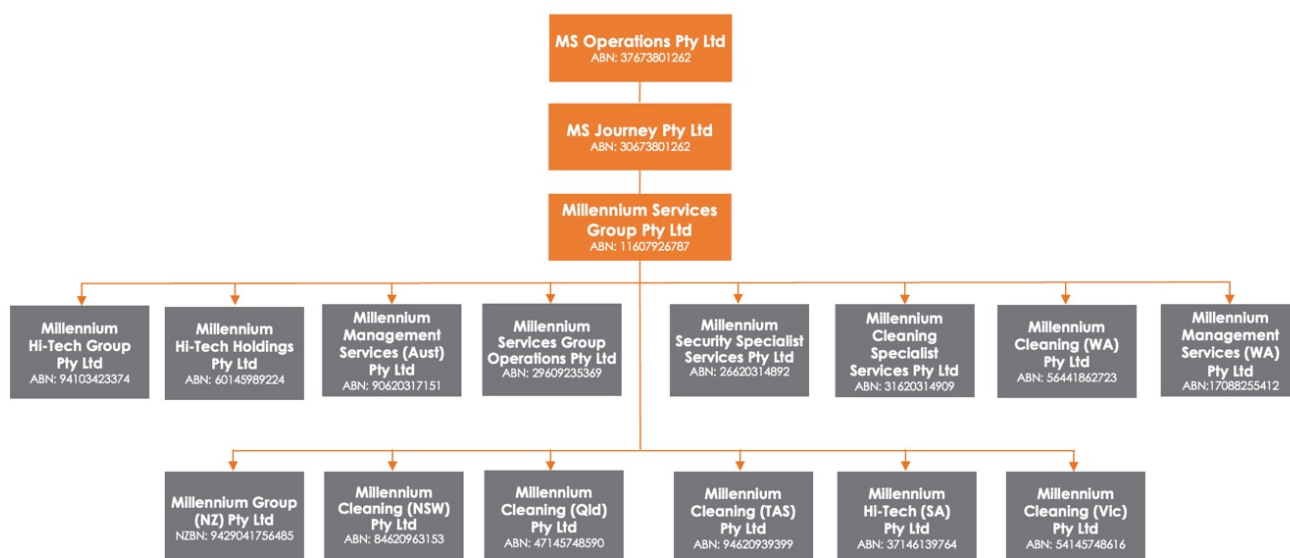


Corporate Structure and Internal Consultation

20. Millennium owns the following controlled entities, the first two of which are new entities that were not listed in last year's Statement:

• Millennium Services Group Operations Pty Ltd	(ABN 29 609 235 369)
• Millennium Cleaning Specialist Services Pty Ltd	(ABN 31 620 314 909)
• Millennium Management Services (Aust) Pty Ltd	(ABN 90 620 317 151)
• Millennium Management Services (WA) Pty Ltd	(ABN 17 088 255 412)
• Millennium Cleaning (Qld) Pty Ltd	(ABN 47 145 748 590)
• Millennium Cleaning (Tas) Pty Ltd	(ABN 94 620 939 399)
• Millennium Cleaning (NSW) Pty Ltd	(ABN 84 620 963 153)
• Millennium Cleaning (WA) Unit Trust	(ABN 56 441 862 723)
• Millennium Cleaning (Vic) Pty Ltd	(ABN 54 145 748 616)
• Millennium Security Specialist Services Pty Ltd	(ABN 26 620 314 892)
• Millennium Hi-Tech (SA) Pty Ltd	(ABN 37 146 13 9764)
• Millennium Hi-Tech Group Pty Ltd	(ABN 94 103 423 374)
• Millennium Hi-Tech Holdings Pty Ltd	(ABN 60 145 989 224)
• Millennium Group (NZ) Ltd	(NZBN 94 290 417 564 85)

21. Pursuant to the Act's requirements, joint consultation between the three reporting entities and internal consultation with all the above-listed Millennium owned and controlled entities occurred both in relation to the preparation of this Statement and in implementing our ongoing modern slavery response. The operations and supply chains of these entities are fully covered by this Statement.
22. As in previous years, this Statement does not cover 2 PM Records Pty Ltd (ABN 24128058006), trading as 'Codee Cleaning Services,' a separate entity in which Millennium holds a significant minority interest.



Our supply chains

23. Millennium actively engaged with a total of **559 unique suppliers** during the reporting period across both our Australian and New Zealand operations.
24. In terms of geographical considerations, Millennium's direct supplier engagement is overwhelmingly with Australian and New-Zealand based suppliers. However, during the reporting period Millennium has also engaged with the following internationally based suppliers:

Location	Industry
China	Advertising and Life Science Tools
USA	Software provider
United Kingdom	Software provider
Romania	Data Processing
South Korea	Electronics Manufacturing
Singapore	Software provider

25. Our procurement activity remains consistent across reporting periods, with no major shifts in the nature and extent of our purchasing activities. Key supplier categories are summarised in the following Table:

Supplier Type	Brief descriptions of products / services provided	Total number of direct suppliers engaged
Cleaning Products and related services	Commercial cleaning consumables and supplies	Consumables and supplies (77) Cleaning services (6)
Staff Apparel	Uniform, Footwear, Weatherproof clothing	Uniforms (9)
Plant & Equipment	Vehicles, Commercial cleaning equipment	Automotive (20) Logistics (17) Machinery hire (5) Signage (9)
Safety Equipment	PPE, First Aid & Spill kits	12
Professional Services	Information Technology, Insurance, HR & Recruitment, Consultancy, Medical services, Legal and Accounting, Property leasing	IT (29) Consultants (32) Employment services (7) Staff health (7) Professional associations (5) Entertainment (4) Insurance (3) Media (3) Financial services (1) Travel agency (1)
Labour Hire Providers	Reliance for both security and cleaning services.	136
Property Management & Other Contracted Onsite Services	Waste Management, Hygiene services, Equipment Hire, Equipment repair & maintenance, Pest Control Security Services	Property Management (104) Waste Management (17) Security services (1)
Utilities and Government	Energy providers, Government bodies, Telecommunication providers	Energy (11) Government (8) Telecommunication (8)
Office consumable and suppliers	Commercial printing, office catering, general office supplies	Commercial printing (4) Catering (3) Office suppliers (3)
Other	Fuel cards, non-profit organisations and donations	Fuel cards (3) Retail (2) Transportation services (2) Non-profit organisation (3) Other (7)



26. Millennium recognises that using sub-contracted labour for security or cleaning services is of particular significance from an overall modern slavery risk mitigation perspective. This is a key consideration both in our supply chain decisions (e.g. procurement processes) and operational practices (e.g. ensuring effective grievance mechanisms are accessible to all sub contracted workers). The measures we have in place to manage these risks are outlined later in this Statement under the reporting criteria on addressing modern slavery risks.

Identifying and Assessing Risks.



Identifying and Assessing Potential Modern Slavery Risks.

Our Operations

- 27.** Millennium did not identify any modern slavery incidences in our operations during the reporting period. Reassuringly, however, (as confirmation that our overall response framework is fit-for-purpose) there were several detections of red flags in relation to modern slavery risks. This occurred through internal detection, reporting, investigation and response to a specific incident, which required specific remedial and corrective action, as described further below.
- 28.** As we did last year, Millennium again completed an annual self-assessment utilising the Property Council of Australia’s Informed 365 Platform. Our overall score placed us in the **Level 2 – Low Risk** category. An overview of the results for the individual categories covered by the assessment are set out in the following table:

Risk Level (Note: Level 5 – very high and Level 4 – high, have been excluded as no areas were assessed in these categories).

Level 1 (Very Low)	L2 (Low)	L3 (Medium)
General Understanding	Education, Training and Partnerships	Supplier Details
Performance and Remediation	Level of Engagement	Current Approach
Employees or Workers from Overseas	Worker Dialogue	Supply Chain Visibility
	Sub-contracting & Third-Party Recruitment	Policies and Procedures

- 29.** Notwithstanding our “Low Risk” assessment for the relevant criteria through the Informed 365 assessment, Millennium continues to recognise the use of labour hire agencies for sub-contracted cleaning and security positions as one of the most significant areas for potential modern slavery risk.

30. Millennium fully recognises that, even in an Australian context, the commercial cleaning and security services sectors present inherently heightened risks of modern slavery due to a confluence of structural and operational characteristics. Industry-wide characteristics include high levels of labour intensity, low cost margins, and extensive use of subcontracting, all of which can obscure employment relationships and hinder visibility into working conditions. The inherent vulnerabilities in these sectors are compounded by a higher prevalence of relatively less secure work arrangements, and historically limited enforcement of workplace protections.

31. In the cleaning industry, employment is typically concentrated among migrant workers, international students, and temporary visa holders, many of whom experience language barriers, limited awareness of legal rights, and a degree of economic dependency that may expose them to exploitative practices.

32. The security sector exhibits similar vulnerabilities. Security officers are often engaged under casual or part-time arrangements, with a large proportion being from culturally and linguistically diverse backgrounds. The use of multiple layers of subcontracting within the sector can hinder transparency of working conditions and accountability. Further compounding these risks is the widespread use of labour hire arrangements, which can serve to fragment the employer-employee relationship and obscure lines of responsibility for ensuring compliance with labour standards.



Our Supply Chains

33. In addition to the inherent risks associated with our core operations in the cleaning and security sectors, we have also identified modern slavery risks in the sourcing of staff uniforms and electronic equipment used to support service delivery. A short description of the risks associated with these supply chain categories is set out below.



Staff Uniforms and Textiles

34. Millennium's procurement of staff uniforms represents a key area of supply chain exposure, given the well-documented risks of modern slavery in the global garment and textile sector. Like many other cleaning and security service providers, uniform sourcing formed a routine component of our procurement activities during the reporting period.
35. Global garment manufacturing is the most widely recognised at-risk sector for modern slavery, from harvesting cotton to manufacturing textiles. Farms and factories are typically located in high-risk countries including China and India. The universal prevalence of migrant workers in apparel industries, along with typically low skilled positions, and lacking overall supply chain transparency all contribute to the globally elevated risk. The 2023 Global slavery index has recognised the exposure to modern slavery practices at multiple stages in the supply chain.²

Electronic and robotic products

36. To support our technology-driven approach to cleaning and security services, Millennium has made investments in advanced robotics and electronic products. However, we recognise that these technologies may carry modern slavery risks.
37. Electronics are recognised in the Walk Free Foundation's 2023 Global Slavery Index as the most valuable product imported by Australia at risk of modern slavery.³ The actual risks that the electronic supply chain is exposed to includes risks of forced labour during the stages of manufacturing and assembly, which often occurs in high-risk locations such as China and Malaysia. There are also potential sources of exposure deeper in the supply chain related to the raw materials used such as cobalt used in batteries and common electrical products.



² <https://www.walkfree.org/global-slavery-index/findings/spotlights/stitched-with-slavery-in-the-seams/>

³ <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

Modern Slavery Risks.



millennium

Addressing Potential Modern Slavery Risks.



“ All Millennium employees continue to be engaged and remunerated in accordance with Fair Work Australia Modern Awards and National Employment Standards. ”

38. All Millennium employees continue to be engaged and remunerated in accordance with Fair Work Australia Modern Awards and National Employment Standards.
39. All substantive operational measures described in our previous Statement for protecting our employed and sub-contract workforce from unacceptable or unmitigated modern slavery risks remain in force, or have been superseded with improved systems and processes.
40. Building upon our existing modern slavery response framework, and particularly in the latter half of this reporting period, Millennium significantly focused our due diligence efforts to even more proactively address key areas of potentially elevated modern slavery risk.
41. Key developments and improvements were (and continue to be) implemented in the areas of:
 - **Expansion of external certification through leading industry bodies**
 - **Substantive due diligence, including onsite auditing**
 - **More comprehensive and meaningful supplier engagement**
 - **A more robust and modern slavery risk-specific registration and monitoring framework, particularly for labour hire / sub-contracted labour providers.**

EXTERNAL CERTIFICATION AND WORKER ENGAGEMENT

Expanding network of Cleaning Accountability Framework Certified Properties

42. Millennium recognises that in line with best practice in modern slavery risk mitigation it is important to maximise opportunities for external certification of worker protection measures to ensure transparency and positive practical impact.
43. The Cleaning Accountability Framework (“CAF”) continues to be one of Australia’s most reputable certification systems. We remain committed to playing an integral role in the significant and continuing expansion of the number of our client’s properties that are CAF certified.
44. In last year’s Statement, we described four commercial properties serviced by Millennium that received CAF certification. We are pleased to report that that this positive trend has continued, with the following properties being certified (or re-certified / confirmed through CAF “health checks”, described as follows):

Location	Date	Asset Owner	New Certification/ CAF Health Check
4 & 6 National Circuit (ACT)	Sept 2024	ISPT	Health Check
Bracken Ridge Plaza (QLD)	Aug 2024	ISPT	Health Check
Karingal Hub (VIC)	Oct 2024	ISPT	New Certification
Waurm Ponds (VIC)	Oct 2024	ISPT	New Certification
1 3-5 & 7 National Circuit (ACT)	Apr 2025	ISPT	New Certification
St Clair Village (SA)	Feb 2025	ISPT	New Certification

45. In order to maintain CAF certification, Millennium as a key stakeholder (and provider of contracted cleaning services) must demonstrate ongoing compliance with CAF standards for the full duration of our services contract. This ensures that our compliance is not assessed as a one-time requirement but is sustained and verifiable over time. CAF’s compliance tools and mechanisms also establish clear processes for identifying and addressing any issues affecting cleaners’ labour rights throughout the certification period. While CAF maintains oversight through various mechanisms, the primary method for verifying our continued compliance is the **annual CAF health check**, which includes worker engagement, review of the implementation of CAF recommendations, and a payroll compliance audit.⁴

External Partnership and Worker Engagement – ISPT, CAF and Millennium

46. Millennium provides an array of cleaning services at 25 ISPT-owned properties across Australia.

⁴ Further details regarding the CAF Health Check process are available online: <https://www.cleaningaccountability.org.au/certification/>

47. ISPT has stated its aim of achieving 100% CAF Certification of its office and retail properties and Millennium is proud to have been a critical partner with ISPT in achieving its industry-leading **gold portfolio CAF certification**.
48. Launched towards the end of the reporting period (November 2024), ISPT's Worker Engagement Program presents a significant and ongoing opportunity for Millennium to expand its involvement in external partnerships that strongly emphasise leading third-party certification, promote fair labour practices and worker protection, and elevate responsible procurement.
49. The Worker Engagement Program has multiple components that are designed to ensure increased awareness about rights and protections that actively mitigate potential modern slavery risk due to underlying potential vulnerabilities (e.g. foreign migrants with visa status linked to employment), including:
- Delivery 45-minute session presented by CAF, United Workers Union, a Millennium representative and ISPT. All cleaners are paid for their time to participate in the presentation.
 - An online worker survey completed during paid, rostered shifts. Prior to survey completion, Millennium delivers a toolbox talk using scripts developed by CAF to explain the program's purpose.
 - To support implementation, CAF provided each cleaning contractor (including Millennium) with a tailored Contractor Resource Pack containing instructions, templates, survey links, and promotional materials for ISPT-serviced sites.
50. As a stakeholder in the worker engagement program, Millennium provided support and facilitated CAF's engagement with workers across twenty-five (25) ISPT assets across Australia:
- | | |
|---------------------------------|-----------------|
| • Queensland: | Nine (9) sites |
| • Victoria: | Eight (8) sites |
| • Australian Capital Territory: | Five (5) sites |
| • New South Wales: | Two (2) sites |
| • South Australia: | One (1) site |



External Auditing of Millennium's Security Services

51. During the reporting period, Millennium's security workforce has also participated in external onsite auditing at nine (9) sites throughout NSW, Queensland and Victoria.⁵
52. These audits have all involved both a document review component and worker interviews. Comprehensive assessment of workplace conditions and human rights protections is a focus area of all these audits, with consistent application of the "Workplace Conditions Assessment Human Rights" (**WCA-HR**) standards developed by SAI Global / Intertek.⁶
53. As part of the WCA-HR framework, auditors assessed each site against a range of modern slavery-specific criteria, including the following

“ These audits have all involved both a document review component and worker interviews. ”



Child Labour

- Sites must only employ individuals aged 15 or above, or the legal minimum age required in the relevant jurisdiction, whichever is higher.
- Employee age verification was confirmed through official documentation, with records securely retained.
- Where applicable, auditors also assessed the wellbeing, training, and protection of any young workers to ensure compliance with all child labour safeguards.

Forced Labour

- Confirmation that there were no instances of bonded or indentured employees.
- Workers retained full control of their personal documentation, including passports.
- No monetary deposits were required from employees, and all recruitment fees were fully borne by the employer.
- Workers had the right to refuse overtime, leave the workplace freely at the end of their shift, and move about the site (e.g., for breaks or restroom use) without restrictions.
- Employment could be terminated by workers at any time without penalty.

⁵ Some of these audits were still underway at the time of completing this Statement.

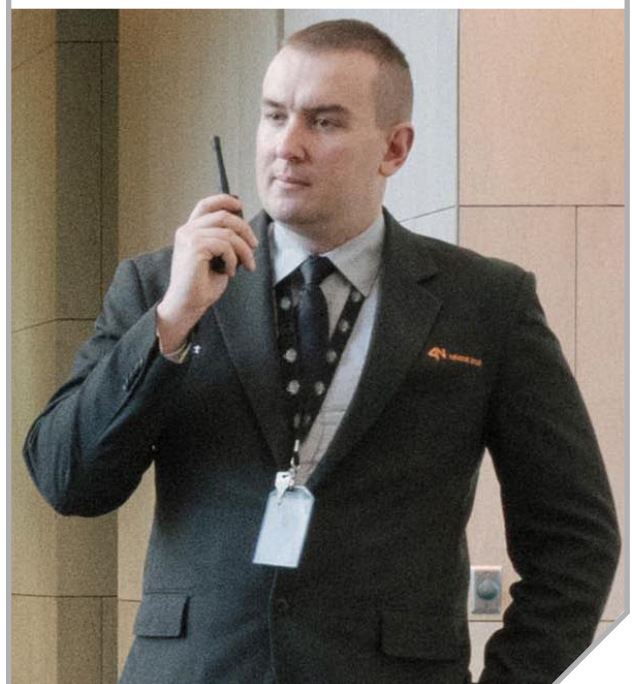
⁶ <https://saiassurance.com.au/workplace-conditions-assessment>

- 54. The audit assessment also includes similarly comprehensive criteria in the areas of discrimination, discipline, harassment or abuse, freedom of association, employment contracts, working hours, wages & benefits and management systems.
- 55. No red flags or indicators of unacceptable modern slavery risks were identified through these audits. Overall, feedback has been positive, confirming that Millennium's systems and procedures are actively mitigating key risks. Notably, one audit reported results above industry average (based on the WCA-HR audit criteria) demonstrating strong performance across key areas of workforce compliance.
- 56. Below is a summarised version of key findings from one of the audits:

“ Workers reported feeling supported, with access to training (including toolbox meetings) and assistance for work-related matters. No suspicious activity was observed during the site inspection. Good practices included in-house training for handling difficult public interactions and access to support services. No issues were identified. ”



“ All workers were paid under the Security Services Industry Award 2020 and received formal employment contracts outlining terms and conditions. Complex shift arrangements were managed effectively, with all entitlements such as overtime and allowances correctly applied. The site used Humanforce payroll software with facial recognition clock-in, and workers received digital payslips fortnightly. ”



57. These findings reinforce the effectiveness of Millennium's workforce compliance framework and support our broader modern slavery risk management efforts.

MAJOR IMPROVEMENTS TO CONTRACTOR RISK MANAGEMENT

58. As described above, Millennium recognises the significant and specific risks relating to the use of sub-contracted labour in the commercial cleaning and security sectors.
59. One of the major improvements implemented this reporting period was Millennium's comprehensive rollout of a new contractor risk management module in '**DoneSafe**'.
60. The comprehensive requirements and substantive procedures that are implemented through this software are designed to ensure practical and on-the-ground protections for Millennium's sub-contracted workforce across the following periods of engagement:
- The pre-contractual (tendering and procurement screening) phase;
 - Throughout the lifetime of all sub-contracted worker arrangements.
61. These protections are anchored through key document frameworks including the Contractor Agreement and Contractor Safety Management Procedure.
62. A major feature of the DoneSafe platform and our newly operationalized Contractor Safety Management Procedure ("**the Procedure**") is the embedding of a requirement for all contractors (including labour hire providers/subcontracted cleaning and security workers) to be vetted and registered in the DoneSafe System. The Procedure highlights coverage of modern slavery issues, including risk mitigation measures.

“ Its a requirement for all contractors to be vetted and registered in the DoneSafe System. ”



hsi
donesafe

63. The Procedure ensures that Millennium procurement team members and other key staff are required to undertake modern slavery related risk assessment and due diligence of a contractor prior to engagement and before registration can occur through the DoneSafe platform.
64. DoneSafe also standardises and strengthens our contractor induction processes. As modern slavery awareness is a core part of Millennium's induction materials, contractors receive clear guidance on identifying and addressing such risks from the outset of induction.



65. We also recognise the importance of legally binding clauses in supplier contracts to ensure the protection of Millennium's sub-contracted workforce. During the reporting period, Millennium has also updated our Contractor Agreement to support the integration with DoneSafe. The Contractor Agreement administered under the DoneSafe platform contains extensive responsibilities that are relevant to actively mitigating areas of potentially elevated modern slavery risk, including:
- Full agreement to periodic social and wage compliance auditing and assessment; and
 - A strict prohibition on sub-contracting of agreed cleaning and security services without Millennium's express and written agreement.
66. Overall, Millennium views DoneSafe as a significant improvement in mitigating subcontractor-related risks. Its integration with rostering and payroll systems enhances transparency and strengthens controls, particularly in relation to subcontracted cleaning and security workers.

GOVERNANCE AND POLICY

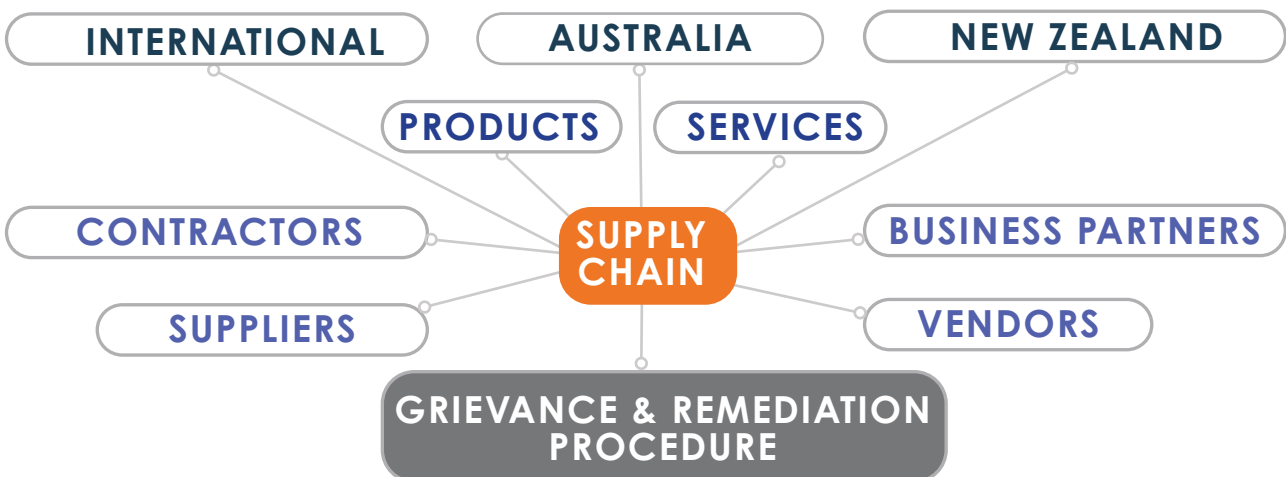
67. Millennium's governance practices and controls to address modern slavery risk are structured under our overarching Modern Slavery Risk Framework with responsibility assigned to Millennium's Board of Directors, People & Risk Committee and Executive & Senior Management team members.

68. Although Millennium has a relatively long-standing policy and governance framework that specifically addresses modern slavery issues (as described in previous Statements), in line with our commitment to continuous improvement, this reporting period saw significant updates occur, which are continuing towards full implementation throughout 2025.
69. Some highlights in this area include:
- Our new Modern Slavery Grievance and Remediation Procedure
 - Updated Modern Slavery
 - Updated Whistleblower Procedures and Awareness raising
 - Updated Code of Conduct Policy

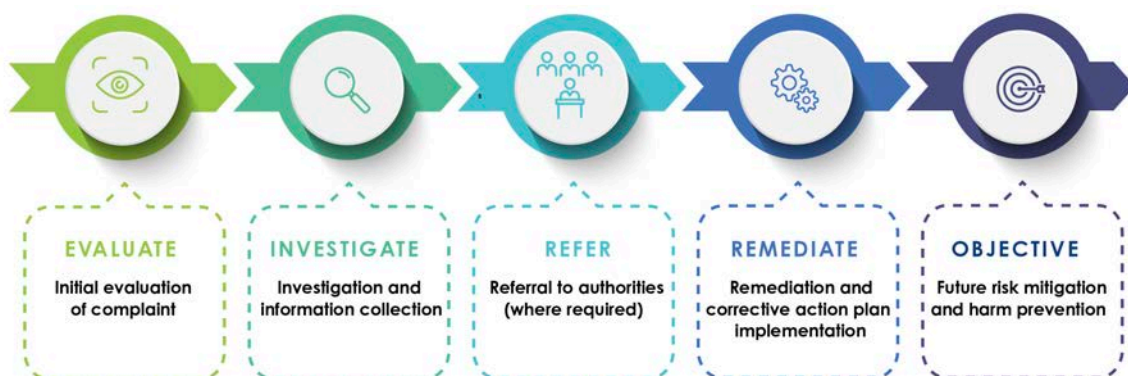


Millennium’s New Modern Slavery Grievance and Remediation Procedure

70. This newly developed procedure is relatively wide-ranging in scope: it applies to Millennium’s entire supply chain, encompassing all suppliers, contractors, vendors, and business partners, both in Australia and internationally. It covers all products and services provided directly or indirectly to Millennium, including those delivered through third-party arrangements. The procedure is relevant to anyone working for or on behalf of Millennium, including contractors and subcontractors, and applies to incidents occurring both on-site and off-site.



71. The Procedure provides detailed steps and specific allocation of responsibility for the making and handling of complaints, with key steps covered including:
- Initial evaluation of complaint
 - Investigation and information collection
 - Referral to authorities (where required)
 - Remediation and corrective action plan implementation
 - Future risk mitigation and harm prevention



72. We have also updated our Modern Slavery Policy during the reporting period to embed references to the new Procedure, ensuring a consistency across our policy framework.
73. Further details of the process for making modern slavery-related grievances and complaints are set out on page 30.

Updated Code of Conduct

74. Another significant improvement to Millennium's Policy framework was the update of our existing Code of Conduct, with an aim towards achieving closer alignment with the UN Guiding Principles on Business and Human Rights and the International Labor Organisation, including through more expansive and specific provisions relating to modern slavery issues and risk mitigation.
75. Millennium's Code of Conduct affirms our commitment to preventing modern slavery practices in our operations and supply chains. It contains specific commitments for suppliers (including sub-contractors) in relation to:
- Child and Forced Labour
 - Safe and Secure Workplaces
 - Proper worker remuneration
 - Freedom of Association and Collective Bargaining
 - Independent and confidential grievance mechanisms
 - Confirmation of Right to Work
 - No unauthorised sub-contracting of work or labour.

GRIEVANCE PROCEDURE AND COMPLAINTS

76. Millennium offers multiple channels for reporting grievances related to alleged modern slavery practices to ensure accessibility, confidentiality, and a clear path to resolution.
77. Grievances may be submitted through:
- **Our Reporting Hotline:** Anonymously, through the company's independent, external grievance reporting service (STOPLINE) via Phone, Email, Post or National Relay Service (NRS). No modern slavery related complaints were received via STOPLINE during the reporting period.
 - **Direct Reporting:** Employees, contractors, or business partners can report directly to their immediate managers, the Compliance Officer, or our People & Culture Group.
 - **Third-party reports** may be made by any interested stakeholders, including social compliance auditors, non-governmental organisations, trade unions, or community representatives.
78. To strengthen frontline awareness and accessibility of our grievance mechanism, Millennium developed user-friendly posters during the reporting period. These will be rolled out across all operational sites in the next reporting cycle. The posters:
- Clearly identify modern slavery as a reportable issue;
 - Include a QR code linking directly to the STOPLINE reporting portal for easy mobile access; and
 - Support multilingual communication to ensure all worker groups can engage with the grievance process



REMEDIAL AND CORRECTIVE ACTION

79. As noted in the section on Identifying and Assessing Risk, during the reporting period Millennium identified a situation involving elevated indicators of modern slavery-related risks. This matter related to irregularities in timekeeping practices, perceived preferential rostering, and concerns raised by employees about the conduct of a particular individual.

80. While the incident was limited in scope, Millennium took it seriously and responded immediately in a considered, and collaborative manner. A multi-pronged approach was implemented, with support from relevant stakeholders, which included:

- **Targeted Employee Refresher Training** – Reinforcement of key policies including the Whistleblower Policy, Code of Conduct, and the STOPline reporting tool to ensure staff are aware of their rights and responsibilities.
- **Cross-Functional Review** – An internal review was initiated to enhance complaint management and escalation procedures, with the aim of improving communication across all relevant functions.
- **Technology Improvements** – The biometric timekeeping system was upgraded with enhanced facial liveness detection capabilities, helping to ensure robust and reliable verification of worker identity.
- **Enhanced Oversight** – A dedicated Account Manager was appointed to the site to provide increased day-to-day visibility and support, reinforcing accountability and oversight.

81. Millennium's new Modern Slavery Grievance and Remediation Procedure (described above) sets out a broad range of potential remedial action that may be taken in the event of a substantiated complaint or grievance, including:



Targetted Employee Refresher Training
Key policies
Whistleblower
Code of Conduct



Technology Improvements
Facial liveness detection



Enhanced Oversight
Dedicated Account Manager



- Direct Support for Affected Workers:**
Where appropriate, Millennium may provide access to services such as medical treatment, counselling, or short-term accommodation. Financial assistance may also be offered to help cover urgent needs, such as repatriation costs or unpaid wages.
- Restitution and Financial Redress:**
In situations involving wage theft, excessive fees, or other forms of economic exploitation, Millennium will seek to ensure workers receive full reimbursement. Where third-party suppliers are involved, Millennium may play a facilitation and oversight role to ensure corrective payments are made.
- Legal and Advocacy Support:**
Workers affected by trafficking, coercion, or visa violations may be offered legal support, referrals or direct assistance to help them navigate labour and immigration protections.
- Law Enforcement Reporting:**
If the incident involves suspected criminal activity, reporting to the appropriate authorities will occur, in line with applicable legal requirements and exceptions.
In circumstances where victims may be at risk (e.g., state-backed forced labour), Millennium will consult with the affected individuals or their representatives before involving law enforcement.

82. In cases involving suppliers, Millennium may implement a Corrective Action Plan (“**CAP**”) to address and remediate identified harms. Our Operations and Compliance teams work collaboratively with the supplier to support the effective and timely implementation of the CAP. Where there is serious or repeated non-compliance, termination of the supplier relationship may be considered, but Millennium will typically only consider this after a responsible exit strategy is developed to minimise potential harm to affected workers.

CONTINUING EDUCATION AND TRAINING PROGRAMS

83. As per descriptions in previous years, internal education and awareness raising on modern slavery issues is well embedded into Millennium's overall modern slavery response. Our pre-existing modern slavery training modules remain available for all staff via our dedicated human resources and information systems portal.
84. However, consistent with our commitment to continuous improvement, Millennium has also commenced a complete overhaul of our internal modern slavery training modules and is engaging external providers for the development of more practical, role-focused capacity building which will supersede the existing module.
85. Separately tailored training programs are anticipated for rollout before the end of 2025 for the following cohorts across Millennium, and will be fully integrated into broader mandatory induction processes:
- Managers;
 - Frontline Staff (i.e. employed cleaners and security guards); and
 - Millennium's Subcontractors.
86. While Millennium was in the process of re-designing the internal modules, we have benefited from targeted external events to keep key stakeholders informed and build capability in the interim. These included webinars and online training events facilitated by industry organisations focused on identifying risk, improving modern slavery focused grievance mechanisms, impacts of the Australian Government's Response to the Modern Slavery Act Review and key aspects of a modern slavery response framework.



- Understanding the Australian Government's Response to the Modern Slavery Act Review 13/12/24



- Modern slavery risk in the global freight sector –22/8/24
- Introduction to Modern Slavery Risk –28/11/24

INFORMED 365



- Modern Slavery Grievance Mechanisms 2/4/25

Measuring Effectiveness.

A large, illuminated bar chart with a grid pattern, glowing in a dark environment. The chart consists of numerous vertical bars of varying heights, each filled with a fine grid of small squares. The bars are lit from within, creating a warm, golden glow. The chart is set against a dark background, and the lighting creates a sense of depth and perspective. The overall aesthetic is modern and data-driven.

Measuring Effectiveness.

87. One important aspect of our approach to measuring effectiveness is, where appropriate, to candidly recognise the areas where our actual progress on a foreshadowed initiative may have not met our earlier plans and expectations.
88. In last year's Statement, we outlined a Roadmap of planned actions and focus areas around our three key response pillars of **Internal Operations**, **Supplier Management** and **Industry Partnerships**. As described throughout this Statement, Millennium considers that key progress and improvements have occurred through significant initiatives across all three of these key pillars throughout this reporting period.
89. However, for a more granular view, the following Table references those forward-looking descriptions and provides our brief assessment of the level to which they have been implemented this year.

2024 Roadmap – Planned Action / Focus Area	Status in 2025
Focus on completion of modern slavery training for Managers and develop training module on modern slavery risk for Front Line Staff	<p>Partially complete.</p> <p>Millennium has prioritised enhancing the quality and relevance of training over meeting minimum compliance thresholds. During the reporting period, we engaged external experts and commenced a full redesign of modern slavery training modules for both management and frontline staff.</p>
Rollout of HSI Donesafe – HSEQ System	<p>Complete.</p> <p>Initial implementation of the Donesafe platform was successfully completed during the reporting period.</p>
Continue rollout of SHEQSY Lone Worker System	<p>Strategically withdrawn.</p> <p>Following internal review, the system was found to have limited practical uptake. Millennium has shifted focus to developing internal lone worker safety guidelines.</p>



“ Labour hire providers were successfully integrated into the Donesafe system, supported by the rollout of new contractor management procedures. ”

2024 Roadmap – Planned Action / Focus Area	Status in 2025
Conduct annual supplier review	<p>Complete and ongoing.</p> <p>Annual supplier screening was conducted via both the Donesafe contractor onboarding processes and the Informed365 platform. This activity will continue annually to assess and manage modern slavery risks in our supply chain.</p>
Conduct Internal Supplier Due Diligence of all Labour Hire Providers	<p>Complete.</p> <p>Labour hire providers were successfully integrated into the Donesafe system, supported by the rollout of new contractor management procedures. Additionally, Millennium completed an internal audit to ensure compliance with labour hire licensing obligations and certification requirements.</p>
Educate Suppliers on Modern Slavery Risk	<p>Partially complete.</p> <p>New tailored supplier education modules are currently being finalised and are scheduled for rollout in the next reporting period.</p>



ELOISE ROCHER

Millennium National Environmental and Sustainability Manager

Eloise was appointed to her current role in 2024, and is a committed sustainability professional, who is passionate about driving ESG initiatives and cultivating community engagement.

Eloise provides support and advice on all sustainability related issues, and is responsible for developing effective strategies and initiatives which benefit both Millennium and our clients.

2024 Roadmap – Planned Action / Focus Area	Status in 2025
Induct suppliers into the HIS Donesafe Contractor Management System	<p>Complete and ongoing.</p> <p>The onboarding of suppliers into the Donesafe system progressed throughout the reporting period, with initial focus on service contractors and labour hire providers. Supplier transition will continue into the next reporting period.</p>
Improve on the performance of Third-Party systems such as EcoVadis	<p>Partially complete.</p> <p>Millennium is currently reviewing its engagement strategy with third-party platforms. Oversight responsibility has been formally assigned to our newly appointed Environment & Sustainability Manager.</p>
Identify and participate in Industry Networks and Forums	<p>Completed.</p> <p>Millennium actively participated in training programs offered by a range of industry forums and is currently in the process of obtaining membership with the UN Global Compact Network Australia.</p>

Continuous Improvement.



Looking Forward and Continuous Improvement.

90. Millennium's People and Risk Committee has approved a new Modern Slavery Strategy, which is designed to further solidify improvements to Millennium's overall modern slavery response framework. This significant development will guide our actions for the remainder of 2025, into 2026, and beyond.
91. The Strategy covers ten key pillars for Millennium's holistic modern slavery response, including:
- Governance & Accountability
 - Purpose & Commitment Statement
 - Risk Identification & Due Diligence
 - Supplier Engagement
 - Collaboration & Advocacy
 - Employee Training & Awareness
 - Reporting Mechanisms
 - Grievance & Remediation
 - Reporting & Transparency
 - Monitoring, Evaluation and Continuous Improvement
92. Millennium's People and Risk Committee is also exploring future partnership opportunities with a leading anti-slavery NGO to engage and train survivors of modern slavery in paid cleaning positions. Whilst still at an exploratory and preliminary phase, Millennium views this kind of opportunity as one with real potential for positive impact on those most affected by past modern slavery practices and is excited to pursue it.

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SERVICES GROUP PTY LIMITED

This **Modern Slavery Statement** has been prepared pursuant to the reporting requirements under the Modern Slavery Act 2018

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