millennium
SERVICES GROUP PTY LIMITED

Modern Slavery Statement.

Reporting Period
1 April 2025 – 31 March 2026



Millennium Services Group Pty Ltd ABN 11607926787
MS Journey Pty Ltd ABN 30673801673
Smart Building X Australia Pty Ltd ABN 37673801262

Approval by Principal Governing Bodies.

In accordance with the requirements of the **Modern Slavery Act 2018** ("the Act"):

- This Joint Modern Slavery Statement was approved by the Boards of **Millennium Services Group Pty Ltd**, **MS Journey Pty Ltd** and **Smart Building X Australia Pty Ltd** on 29/9/2026.
- 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 Director of Millennium Services Group Pty Ltd on 29/9/2026.



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 Smart Building X Australia Pty Ltd on 29/9/2026.



Chow Kin Hoong Andrew
Director,
MS Journey Pty Ltd and
Smart Building X Australia Pty Ltd.

Quick Reference Guide to Act's Reporting Criteria	
Reporting Criteria - Section 16(1)	**Where to find in this Statement**
(a) - Identify the reporting entity.	Page 9, paragraph 1 (three entities covered by the joint statement); and page 15, paragraph 18 (their respective roles).
(b) - Describe the structure, operations and supply chains of the reporting entity.	Pages 9–13, paragraphs 2–13 (operations and workforce); page 14, paragraphs 14–17 (suppliers and corporate structure); page 15, paragraphs 18–20 (reporting and controlled entities).
(c) - Describe the risks of modern slavery practices in operations and supply chains.	Pages 17–18, paragraphs 22 and 26–29 (operational and subcontracted labour risks); page 19, paragraphs 30–33 (supply chain risks).
(d) - Describe the actions to assess and address those risks, including due diligence and remediation processes; and	Pages 21–31, paragraphs 34–70. The most direct references are pages 23–25, paragraphs 38–48 (controls and due diligence), pages 27–29, paragraphs 52–61 (worker engagement, audits, and training), and pages 30–31, paragraphs 62–70 (grievances and remediation).
(e) - Describe how the reporting entity assesses the effectiveness of such actions.	Pages 33–34, paragraphs 71–73, including progress table onto page 34. Specific results also appear at pages 24–25, paragraphs 43–48, and page 31, paragraph 68.
(f) - Describe the process of inter-entity consultation.	Page 15, paragraph 20. Page 14, paragraph 17 identifies entities in the corporate structure.
(g) - Other relevant information.	Pages 6–7 (CEO message); page 29, paragraphs 57–58 (industry collaboration); page 34, paragraph 73 progress table; and page 35 (worker-facing reporting information, unnumbered).

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Message From Millennium's CEO

Introduction to 2025/26 Statement.

The 2025–2026 reporting period marked another important year in the continued development of Millennium Services Group's approach to identifying, assessing and addressing modern slavery risks.

As a major employer and provider of cleaning, security and integrated property services across Australia and New Zealand, we recognise that our responsibilities extend beyond legal compliance. They require sustained vigilance, strong governance and practical measures that protect the dignity, rights and wellbeing of people working throughout our operations and supply chains.

During the year, we continued to embed our Modern Slavery Risk Framework across the Group. This included strengthening our policy and governance arrangements through the introduction of a Human Rights Policy, an updated Supplier Code of Conduct and new Sustainable Procurement and Business Ethics Policies. We also continued implementing our enhanced Contractor Management Procedure, supported by Donesafe, Humanforce and other systems that help us screen, approve and monitor contractors and workforce-related risks.

An important demonstration of these controls occurred shortly after the reporting period, when our pre-engagement due diligence identified that a prospective labour-hire provider appeared to have submitted licence information belonging to an unrelated entity. The provider was not approved or engaged, was prevented from pursuing further engagement with Millennium and was reported to the appropriate authority.

We responded by conducting a targeted internal audit of 211 contractors, including 37 labour-hire licences and 21 master security licences. No further licensing discrepancies were identified.

The audit also provided opportunities to improve legacy contractor records, system workflows and the documentation of contract variations. Corrective actions were formally recorded and are being implemented.

This outcome demonstrates the importance of effective preventative controls. It also reinforces our commitment to investigating warning signs, testing whether issues may be more widespread and using the findings to improve our systems.

We continued to support independent worker engagement and assurance through the Cleaning Accountability Framework, including paid worker-engagement activities across sites serviced by Millennium. We also participated in external audits of our cleaning and security operations and strengthened access to confidential and anonymous grievance mechanisms through STOPline and improved onsite information.

Our modern slavery training has also been redesigned to provide more practical, role-relevant guidance, with an initial focus on leaders and employees working in compliance, finance, payroll, people and culture, safety and procurement.

No instances of modern slavery were identified or reported within Millennium's operations or supply chains during the reporting period. We do not, however, regard the absence of identified cases as a reason for complacency. The industries in which we operate continue to present elevated risks, particularly in connection with subcontracted labour, migrant and temporary-visa workers, complex employment arrangements and global supply chains.

I am proud of the commitment shown by our people, suppliers, clients and external partners. Millennium will continue to build on this work through our multi-year Modern Slavery Strategy and our ongoing focus on prevention, worker voice, responsible procurement, independent assurance and continuous improvement.



Royce Galea
Chief Executive Officer,
Millennium Services Group



Operations Supply Chain Structure.

Millennium – Operations, Supply Chains and Structure.

1. This is the Joint Modern Slavery Statement for the reporting period of 1 April 2025 – 31 March 2026 in relation to the following reporting entities:

    - Millennium Services Group Pty Ltd (ABN 11 607 926 787)
    - MS Journey Pty Ltd
    - Smart Building X Australia Pty Ltd[1]

    (referred to collectively throughout this Statement as "Millennium", "we" and "our", unless the context requires individual differentiation).

2. Throughout Australia and New Zealand, Millennium provides a broad array of clients with quality commercial premises cleaning, security and integrated property services at a diverse array of more than 910 individual sites, including retail properties, food courts, educational campuses, distribution centres and airports.

3. Millennium offices / staff premises are spread throughout major Australian and New Zealand cities, including:

ADELAIDE	BRISBANE	CANBERRA	DARWIN	HOBART
MELBOURNE	PERTH	SYDNEY	AUCKLAND	CHRISTCHURCH

4. Our key business activities – including our service offerings and overall procurement profile continues to be generally consistent with last year's Statement. Where there have been substantive changes or updates in a particular area, we have included relatively greater detail in the descriptions provided in this Statement.

5. Millennium takes great pride in the important role we play in the mainte nance, protection and enhancement to the built environment. Our clients span the Australian (and New Zealand) sectors of Retail, Commercial, Government, Hospitality, Education and various Industrial sectors.

6. An overview of the integrated property services that we offer (in addition to core cleaning and security) includes:

CONCIERGE	HYGIENE	WASTE MANAGEMENT
PROPERTY MAINTENANCE / FACILITY SUPPORT		

[1] On 16 July 2026, the holding company - MS Operations Pty Ltd (a joint reporting entity in last year's Statement) underwent a formal business name change to Smart Building X Australia Pty Ltd. There was no change to the ABN/ACN, directors, share-holders, or number of shares held.

7. Millennium's continued endorsement and external recognition through external bodies remains an important part of our overall quality control, including:

- Australian Security Industry Association Limited (ASIAL)
- Platinum Cleaning Accountability Framework
- Ecovadis
- Property Council of Australia
- Supply Nation
- Department of Veteran Affairs – Veteran Employment Supporter
- Contractor Accreditation Limited (NT)

8. We also hold and maintain all applicable State-based regulatory approvals for operations and business activities including:

- ACT Secure Local Jobs Code
- VIC Fair Jobs Code (Pre-Assessment Certificate)
- Labour Hire Authority (Victoria)
- Registered Labour Hire Provider (QLD)



"Millennium's Vision and Approach: Combining Cutting-Edge Technology with Workforce Excellence"

Millennium continues our pursuit of leading the commercial building services sector by strategically integrating the latest technological advances with the essential, hands-on skills provided by our dedicated team members. Currently implemented innovations in our core operations and service offerings are summarised in the table below:

Technology supporting workforce governance and responsible service delivery.
Technology strengthens Millennium's workforce governance, due diligence and operational oversight. These systems support – not replace – management accountability, worker engagement and the investigation and remediation of identified concerns.

AI-Enabled Compliance Analytics – examines workforce and payroll data against applicable awards, enterprise agreements and other industrial instruments. Potential wage or entitlement anomalies are flagged for human investigation and correction, adding assurance around fair, accurate and timely payments.

humanforce

Humanforce – unites talent, HR, workforce management and payroll in one platform. It supports recruitment, onboarding, rostering, attendance, award interpretation and payroll controls, helping Millennium deploy capable people efficiently while giving clients confidence in wage compliance and service continuity.

Work-Rights Assurance – Millennium uses VEVO in Australia and RealMe in New Zealand to validate employees' identity and legal right to work. These checks strengthen responsible recruitment, reduce immigration and labour-compliance risks, and give clients confidence that workers are lawfully engaged.

hsi donesafe

HSI Donesafe – integrates, quality inspections, audits, hazards, incidents, contractor prequalification, and corrective actions into a single platform. Real-time dashboards and reporting provide clear visibility, accountability and assurance that risks are controlled, and service standards maintained.

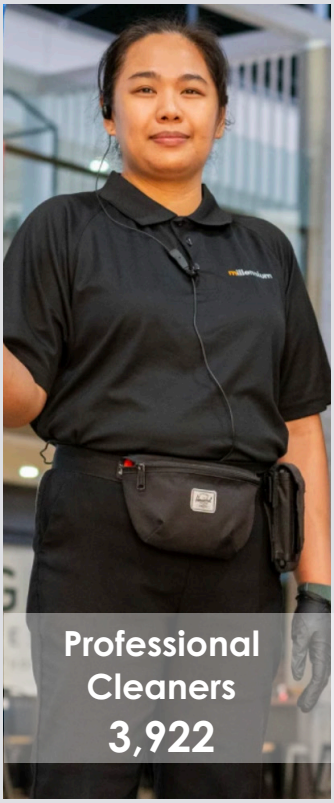
Smart Workforce Tracking - on-site sensors verify attendance, location, rotation frequency and time in each area. Real-time alerts enable faster, targeted deployment, while live visibility and auditable reports improve safety, accountability and give clients clear evidence that service levels and KPIs are met.

Key Workforce Characteristics

9. The Millennium team's characteristics in terms of employee type breakdown and overall numbers, have remained relatively consistent across this and the last reporting periods, with comparative figures outlined in the Tables below:

Employee Type	This Reporting Period	Last Reporting Period
Full-time	**1,359**	1,299
Part-time	**2,757**	3,054
Casual	**739**	605
Total	**4,855**	4,958

Role Type	This Reporting Period	Last Reporting Period
Professional Cleaners	**3,922**	4,101
Security Officers	**546**	733
Professional and Managerial Staff	**303** 128 professional staff (including account managers) 175 managerial staff (employees with direct reports)	124







10. As per descriptions in earlier Statements, Millennium acknowledges both the essential contribution of our contracted workforce and the important modern slavery risk considerations that arise from this ubiquitous industry characteristic. During the reporting period, additional personnel equivalent to slightly over 10% of our total employed workforce worked for Millennium on a contracted basis, with 611 individuals working for us via such an arrangement.

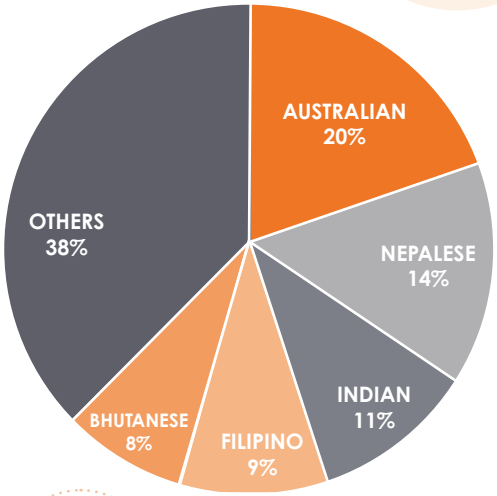
11. Indeed, in recognition of the significance of issues relating to our contracted workforce, as discussed in more detail below (in relation to Millennium's practical approach to addressing risk), an important feature of this reporting period was the effective detection, reporting and non-engagement with (what was exposed to be) a fraudulent labour hire service provider that (unsuccessfully) pursued a commercial arrangement with Millennium.

12. Defining characteristics of Millennium are our ongoing commitments to celebrate and promote multiculturalism, diversity, and respect for First Nations people. We pride ourselves on offering quality employment opportunities for people:

- with disabilities,
- recently emigrated to Australia,
- returning to work after unemployment, and
- seeking flexible working arrangements other than full-time positions.

13. The pie chart below sets out the ethnic diversity of our workforce for the reporting period.

Others 38%
Australian 20%
Nepalese 14%
Indian 11%
Filipino 9%
Bhutanese 8%













Our supply chains

14. In this reporting period, our first tier (direct) supply chain comprised 594 unique suppliers. In comparison, we engaged with a total of 559 companies in the last reporting period.

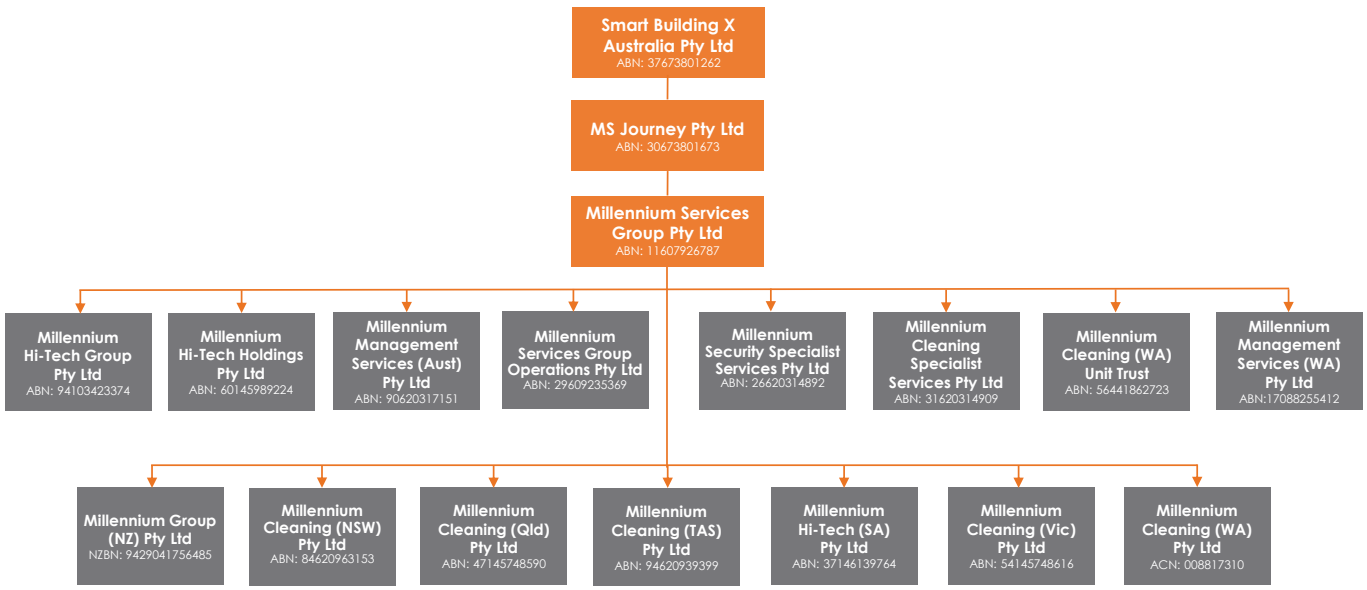
15. In terms of geographical considerations, Millennium's direct supplier engagement continues to be overwhelmingly dominated by Australian and New Zealand-based suppliers.

16. Our direct engagement with international suppliers remains consistent across reporting periods, with no major shifts in the nature and extent of our relatively limited foreign purchasing activities, as per the following summary table:

Supplier Sector	International Supplier Location(s)
Computer Software Provider	USA, United Kingdom, Singapore
Specialist Electronics	South Korea
Data Processing	Romania
Advertising	China
Life Science Tools	China

Corporate Structure and Consultation

17. Millennium's corporate structure is outlined in the following chart:



18. As with last year's Statement, the only operational entity covered by this Statement is Millennium Services Group Pty Ltd. The other two reporting entities - MS Journey and Smart Building X Australia - are holding companies, with no separately employed staff or procured goods (supply chains).

19. Millennium Services Group Pty Ltd is owned by SoftBank Robotics Singapore Pte Ltd, which is part of the SoftBank Group.

Corporate Structure and Internal Consultation

20. As per the descriptions in last year's Statement, Millennium also owns the following controlled entities:

• 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 37 146 139 764)
• 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)

The operations and supply chains of these entities are fully covered by this Statement. We confirm that the single operational reporting entity and all of the above-listed Millennium owned and controlled entities have been subject to internal consultation in accordance with the Act's reporting criteria[2].

[2] As with previous years, this Statement does not cover the operations and supply chains of 2 PM Records Pty Ltd (ABN 24128058006, and registered business name of Codee Cleaning Services). Millennium owns a significant minority share in this entity.

Identifying and Assessing Risks.



How Millennium identifies and assesses potential risks.

21. Millennium did not identify or receive reports of any modern slavery incidences in our operations or supply chains during the reporting period.

22. However, due to the industry sectors in which we operate, we recognise the importance of constant vigilance. Millennium continues to implement a multi-faceted approach to careful, comprehensive and regularly updated risk assessment in relation to both our supply chains and operations.

Operational Considerations

23. All substantive operational measures described in Millennium's earlier Modern Slavery Statements in relation to ensuring that both our directly employed and sub-contractor workforce is protected from unacceptable or unmitigated modern slavery risk continue to be implemented or have been updated (with such changes described in the next part of this Statement).

24. Fair Work Australia Modern Awards and National Employment Standards continue to be strictly applied in the remuneration of all our employees, including those working in frontline cleaning and security positions.

25. The new CAF-sanctioned Cleaning Accountability Framework Contract Mobilisation and Transition Guide developed by Millennium establishes structured consultation, written employment offers, compliance, employee and union engagement, and auditable records during cleaning contract transitions, helping reduce risks associated with insecure employment, misinformation and vulnerable workers.

26. Well recognised inherent industry characteristics that result in overall elevated risk in the Australian commercial cleaning and security sectors include:

- High levels of labour intensity,
- Low profit margins,
- Extensive using of subcontracting, which can sometimes be multi-layered,
- Potentially obscure employment relationships,
- A proportionally far higher reliance on migrant labour, international students, and temporary visa holders,

- A workforce where language barriers, limited awareness of legal rights, and a degree of economic dependency are relatively prevalent,
- A higher prevalence of relatively less secure work arrangements, and
- Historically limited enforcement of workplace protections.

27. Millennium's approach to operational risk assessment includes practical recognition of the reality that the sub-contracted labour for security or cleaning services is a key factor from an overall risk mitigation perspective. Millennium prioritises direct employment of staff rather than use subcontractors, wherever possible. Subcontractors should not be used without prior consent from clients and are generally not used for core contract hours, but may be used for surge requirements only such as Christmas or other peak periods.

28. In last year's Statement, we described one of the factors that provides assurance that our response framework is operating appropriately, in the form of effective detection of, and a timely response to, significant red flags that we detected in relation to a particular situation. A similar positive indicator has occurred more recently in the early detection (and exclusion) of a prospective labour hire agency that was found to be using fraudulent licensing information (described further in following pages).

29. For the third successive reporting period, Millennium used the Property Council of Australia's Informed 365 Platform to undertake annual self-assessment of operational considerations. An overview of the results for the individual categories covered by the assessment are set out in the following table.

Individual Criteria	**Level**
Supplier Details	Medium
General Understanding	Very Low
Education, Training and Partnerships	Low
Current Approach	High
Policies and Procedures	High
Supply Chain Engagement	Medium
Level of Engagement	Low
Worker Dialogue	Low
Performance and Remediation	Very Low
Sub-contracting & Third-Party Recruitment	Very Low
Employees or Workers from Overseas	Very Low
Overall Score	Low



In our Supply Chains

30. In last year's Statement, we described identified drivers of elevated risk in the procurement of **Staff Uniforms** and **Electronic Products**, both of which continue to be significant components, from a modern slavery risk perspective, of Millennium's overall procurement activity.

31. The identified risks in these product categories are assessed as being heavily concentrated in the deeper tiers of the value chain, rather than in connection with the operations of our direct (1st tier) suppliers. In many cases, the raw material extraction and componentry manufacturing stages are the highest risk areas, and there continues to be significant challenges in relation to effective supply chain tracing through complex global networks.

32. Millennium also recognises the potential tension that exists between efforts to decarbonise supply chains (including our own) and potentially elevated risks. This relates to more ecologically sustainable solutions in relation to new generation EVs, lithium batteries and solar panels. For example, while preparing this Statement, Millennium became aware of Global Witness' newly released (mid-2026) investigative report - "Who buys Rwanda's smuggled coltan?" (June 2026), which identified alleged supply chain linkages to conflict-tainted coltan via the systemic manipulation of international schemes designed to assure ethical product certification. One of the Report's key conclusions was that, despite concerted efforts at global tracing via such approved certification programs: "… conflict coltan may have found its way to global brands including Microsoft, Vodafone, Sony, Amazon, Nvidia, LG Display, Ericsson, Toyota and Apple – and into products we use every day."

33. As noted above, Millennium has relatively limited direct supplier engagement with foreign companies, including several suppliers located in countries that are recognised as higher risk for overall modern slavery incidence. Millennium considers that the sectors / supplier types of these international companies are such that, notwithstanding their geographical location, the modern slavery risk associated with their direct operations is assessed as being relatively low.



Risk Mitigation, Due Diligence and other actions to Address Risk.

Embedded Implementation of our Policy and Governance Framework

34. Millennium's People & Risk Committee (a direct Board-level report) continues to oversee our programs to identify, assess and mitigate areas of potentially elevated modern slavery risk.

35. 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.

36. Responsibility for our anti-slavery response is allocated across the Board, the People & Risk Committee, Executive and Senior Management, and relevant operational functions. While the Board and People & Risk Committee provide governance and oversight rather than undertaking day-to-day due diligence and other risk mitigation activities, Millennium's Executive and Senior Management are ultimately accountable for implementation within their areas of responsibility.

37. Practical allocation of governance responsibility for our anti-slavery actions is outlined in the following Table:

Millennium Team Allocation	Summary of Key Anti-Slavery Role(s)
Board of Directors	Maintains ultimate oversight of Millennium's modern slavery response, including approval of the annual Modern Slavery Statement and oversight of material risks, incidents and strategic commitments.
People & Risk Committee	Provides detailed oversight on behalf of the Board. It reviews the Modern Slavery Strategy, progress against planned initiatives, risk and assurance activities, significant grievances or incidents, and the effectiveness of controls and remediation measures.

Millennium Team Allocation	Summary of Key Anti-Slavery Role(s)
Executive and Senior Management	Ensures anti-slavery requirements are embedded within business operations, procurement, workforce management and supplier relationships. Allocates resources, oversees implementation within their functions and escalates material risks or detected non-compliance.
Risk and Compliance Team	Coordinates and oversees the bulk of Millennium's anti-slavery framework. This includes maintaining policies and procedures; identifying and assessing operational and supply-chain risks; overseeing supplier screening and due diligence (through Donesafe and other risk-assessment tools – see below); monitoring internal and external compliance; coordinating supplier and wage-compliance audits; managing or supporting investigations, corrective action and remediation; tracking the Modern Slavery Strategy; preparing internal and annual external reporting.
Procurement, Commercial and Contract Management Teams	Conducts pre-engagement supplier risk assessments and due diligence, incorporates the Supplier Code of Conduct and relevant modern slavery, audit and subcontracting requirements into agreements, and ensures material contract variations receive appropriate review and approval.
Operations, State and Account Management Teams	Implements the controls at contractor and site level. This includes ensuring contractors are approved before engagement, monitoring licences and other required documentation, identifying workforce concerns, providing workers with access to grievance mechanisms, and working with Risk and Compliance to implement supplier corrective action plans.

Millennium Team Allocation	Summary of Key Anti-Slavery Role(s)
People & Culture	Supports employee and worker-related controls, including right-to-work requirements, induction and training, workplace grievance processes, whistleblower awareness and appropriate support for potentially affected workers.
Finance and Payroll	Provides wage and entitlement assurance, payment controls and the provision of records required for internal or independent compliance reviews.

Robust processes to ensure consistent implementation across our operations

38. As outlined in the above summary Table, our core policy and governance approach involves a cross-functional model with whole of company involvement and allocation of responsibility across multiple business units. This structure is supported by a selection of technology products and formal processes to ensure consistent and effective implementation, including:

- **DONESAFE** - contractor onboarding and ongoing monitoring through out the contract lifecycle, including audits and corrective action.
- **HUMANFORCE** - workforce and payroll records, supplier screening, targeted due diligence of labour-hire arrangements, worker engagement, independent annual wage-compliance audits
- **STOPLINE** - anonymous and external whistleblower service and grievance reporting mechanism (discussed further below).

Continuing updates to ensure Millennium remains aligned with good practice

39. In last year's Statement, we described significant updates, which were being progressively rolled out into 2025, including substantial improvements to our:

- Modern Slavery Policy
- Modern Slavery Whistleblower, Grievance and Remediation Procedures
- Code of Conduct

40. This continuous improvement trend has continued into 2026, with further material strengthening of our overall anti-slavery framework, including our new Human Rights Policy, which integrates with our recently updated Supplier Code of Conduct.

41. In addition to the rollout of new Sustainable Procurement and Business Ethics Policies, the full implementation of our updated Contractor Management Procedure (described in detail in our last Statement) is an important bridge in ensuring that our comprehensive anti-slavery commitments are translated into risk-based supplier screening, due diligence, contractual controls, and other risk mitigation actions.

Continuing Focus on Ensuring Legitimacy and Worker Rights Protection in relation to Labour Hire

42. Millennium seeks to implement a company-wide approach that gives practical effect to the good practice principle that the best time to undertake supplier-specific due diligence is **prior to** commencement of any contractual relationship.

43. Shortly after the conclusion of this reporting period (but prior to completing this Statement), Millennium undertook its "business-as-usual" procedure of undertaking prospective contractor due diligence, including on an array of potential modern slavery risk indicators.

44. We made a preliminary determination that an applicant labour hire provider appeared to have submitted invalid labour hire licence information. Verification against the regulator's register established that the licence number belonged to an unrelated entity and appeared to have been fraudulently used. The purported provider was not approved or engaged by Millennium, was immediately blacklisted from any further engagement in Donesafe, relevant internal stakeholders were notified, and the matter was reported to the appropriate authority.

45. Whilst the nature of the detected action appeared to indicate an isolated incident, Millennium also took subsequent action to determine whether there may be comparable issues with other labour hire providers.

46. We initiated a targeted, risk-based internal audit of Millennium's contractor management controls. The audit reviewed 211 suppliers, including 37 labour hire licences and 21 master security licences across our operating locations. No additional licensing discrepancies were identified.

47. The audit also identified one non-conformance, one area of concern and two opportunities for improvement relating principally to incomplete migration of legacy contractor records into Donesafe, system workflow and reminder

limitations, and the documentation of contract variations. Corrective actions were identified, outstanding onboarding activities were followed up, and Millennium strengthened licence-verification checks for new contractor applications. The incident therefore demonstrated the effectiveness of Millennium's preventative controls while also prompting further assurance work and targeted improvements to strengthen ongoing contractor governance.

48. Overall, the internal audit concluded that Millennium's contractor management framework was generally operating effectively, with contractors appropriately classified, approved before engagement, and subject to ongoing due diligence and monitoring. Further details of external audits (both regulator and private company-related) relating to modern slavery risk indicators that Millennium has participated in are outlined below.

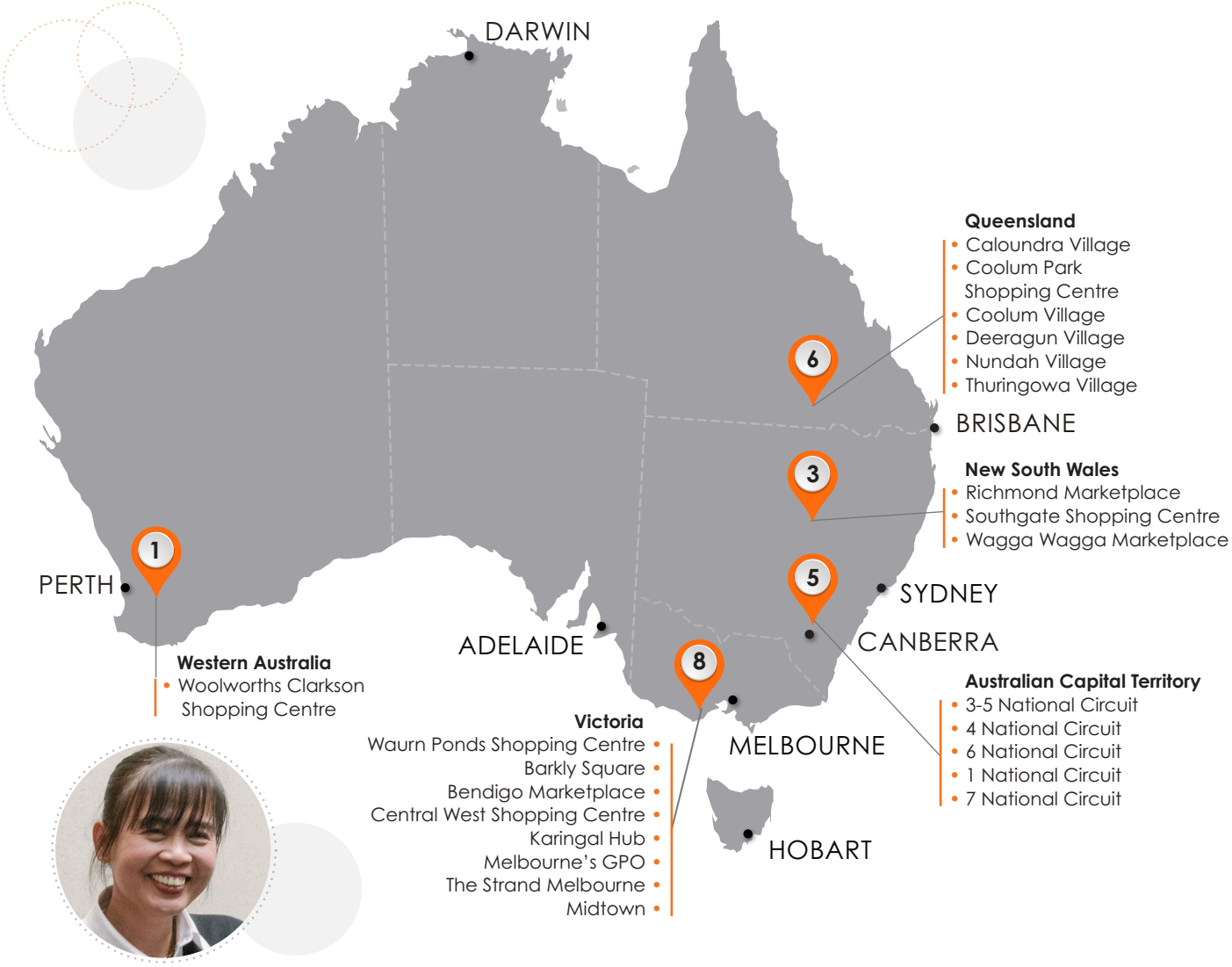
Cleaning Accountability Framework Certification at Millennium Client Properties

49. Millennium continues to service a significant number of commercial premises that are externally certified, and subject to regular "health checks" by the Cleaning Accountability Framework **(CAF)**. Millennium remains fully aligned with the CAF's core objectives of promoting lawful and fair working conditions, worker wellbeing and responsible labour practices. The CAF scheme continues to provide workers with an important opportunity to have their voices heard directly by an independent party and to raise concerns about pay, conditions, treatment or workplace practices outside normal management channels



50. CAF certification involves an ongoing commitment to worker protection and implementation of appropriate risk mitigation measures, including fit-for-purpose grievance procedures that enable stakeholders to raise and address any issues that impact on cleaners' rights at work.

51. The complete list of CAF-accredited properties that Millennium services continues to grow over successive reporting periods, as per the following state-by-state list:







52. All of the above listed ACT and NSW properties (except for Wagga Wagga Marketplace) and the Waurn Ponds Shopping Centre in Victoria underwent Worker Engagement Meetings during the reporting period.

53. As part of ISPT's Workplace Engagement Program (WEP), the Cleaning Accountability Framework (CAF) engaged with workers across 25 sites serviced by Millennium that are part of IFM's Core Fund and IRAPT Fund portfolios.

54. During November 2025, Millennium facilitated sessions across 23 sites in Victoria, Queensland, the ACT, New South Wales and Western Australia. These were paid sessions (during rostered shifts) for workers and included a supervisor-led toolbox talk, a CAF information video and completion of CAF's confidential online worker survey. Eight out of the 23 sites participated in a Worker Engagement Meeting in early 2026. The remaining 15 sites were already participants in WEP and were therefore not required to hold a further Worker Engagement Meeting. Selected sites were also scheduled for follow-up workplace meetings with the United Workers Union.

> ***"Eight out of the 23 sites participated in a Worker Engagement Meeting in early 2026"***









External Auditing of Millennium's Security and Cleaning Operations

55. Throughout the reporting period (and into 2026), Millennium has continued to actively participate in various external audits designed to ensure appropriate risk mitigation strategies are being implemented, and a full range of worker protections are in place.

56. An anonymised overview of these audits is outlined in the Table below.

Audit Instigator/Client	Audit Scope/Criteria	Outcomes
Major Australian Shopping Centre	Wage Compliance Audit	No non-conformances[3]
Major Australian Retailer	Contractor Management & Wage Compliance	In progress[4]
Publicly Listed Resources Company	Environment, Health and Safety (EHS) Management Systems	No non-conformances
Workcover (WA)	Wage Compliance Audit	No non-conformances
Office of Fair Trading (QLD)	Security – Statutory Compliance Audit	No non-conformances
Third-Party Specialist Auditor (engaged by Millennium)	Subcontractor Wage Assessment	No major non-conformances Three Administrative non-conformances: A contractors employment contracts required updating to meet legal compliance. A subcontracted employee worked in excess of the hours permitted by their visa type. A contractor had not registered for a portable long service scheme

[3] This audit commenced prior to the commencement of the reporting period, but outcomes were confirmed after we completed last year's Statement – as previously described.

[4] This audit commenced after the conclusion of the reporting period (in June 2026), but prior to lodgement of this Statement.

Continuing External Collaborations and Industry Partnerships

57. As a member of the UN Global Compact (Australia Network), Millennium fully aligns with the UN Global Compact's Ten Principles on human rights, labour, environment and anti-corruption. Our network membership provides access to guidance, training and peer collaboration, which helps us to further strengthen Millennium's holistic approach to identifying, assessing and addressing modern slavery risks in our supply chains and operations.

58. Millennium continues to actively participate in Informed 365's Property Platform Users Group. This is an industry forum supporting a coordinated response to modern slavery risks and responsible sourcing across the property and construction sectors, including through a standing monthly meeting. Participation in the Users Group allows us to share practical experience with industry peers. It also assists us in remaining up to date with current good practice and emerging obligations, including in relation to approaches to supplier assessment and engagement practices.

> ***"Millennium continues to actively participate in Informed 365's Property Platform Users Group – It assists us in remaining up to date with current good practice and emerging obligations."***



Internal Training, Awareness Raising and Capacity Building

59. In last year's Statement, Millennium flagged a comprehensive revision of our approach to internal training on modern slavery issues, which was planned for implementation.

60. Millennium has now implemented the Cloud Assess learning management system and uploaded its redesigned modern slavery training package, incorporating more practical and role-relevant content.[5] The new module is estimated to be rolled out by end of October 2026 and will be supported by completion monitoring and reporting through our new Humanforce platform, which provides integrated Talent, HR, Workforce Management and Payroll solutions.

61. Our initial focus for participants undertaking our fully updated modern slavery training module includes:

- All employees from manager level and above, and
- Personnel in key administrative functions including Compliance, Finance, Payroll, People and Culture, Safety, and Procurement.

[5] This occurred after the end of the reporting period, but prior to lodgement of this Statement.

Grievance and Remediation

62. Given the industry-wide inherently elevated risks that Characterises Millennium's operating context, we acknowledge the utmost importance of properly functioning and fit-for-purpose avenues for those in our workforce who are potentially most vulnerable to raise grievances and make complaints.

63. Whilst core grievance procedures have been operating on a long-term basis, Millennium took significant steps to further strengthen worker protection and access to remedy during this reporting period.

64. Our updated Whistleblower Policy expressly recognises modern slavery and serious human-rights concerns as reportable matters. Including through the externally operated STOPline service, we provide confidential, protected and anonymous reporting channels with defined investigation and non-retaliation requirements.

65. Our new Onsite Safety Signage and Mandatory Information Procedure also requires STOPline information to be displayed at operational sites, improving frontline awareness and accessibility. On-the-ground compliance with this requirement is subject to regular checks.

66. Millennium continues to offer our entire workforce (and any other interested stakeholder) multiple options for reporting grievances related to alleged modern slavery incidents, unacceptable risks, and/or potential red flags.

67. Concerns and complaints relating to worker rights can be made via:

Direct Reporting: Employees, contractors, or business partners can report directly to their immediate managers, the Compliance Officer, or our People & Culture Group.

Reporting Hotline: Anonymously, through the company's independent, external grievance reporting service (STOPline) via Phone, Email, Post or National Relay Service (NRS)



> ***"We provide confidential, protected and anonymous reporting channels with defined investigation and non- retaliation requirements."***

68. To demonstrate transparency and as an indication that grievance procedures are operating properly, the following is an anonymised snapshot of STOPline usage during the reporting period:

STOPline Report - General Nature of Complaints or Alleged Issue	**No. of Reports**
Suspected Modern Slavery Practices	0
Harassment / Bullying	2
Staff Mismanagement	2
General Customer Complaint	1
Safety Concern	1
Allegation of Fraudulent Conduct	1
Unspecified	1

69. Our Modern Slavery Grievance and Remediation Procedure (described in detail in last year's Statement) describes a variety of pathways and approaches, including:



Direct Support to Affected Workers: this may include financial support, medical care, counselling, or temporary accommodation for those affected by modern slavery practices.



Reimbursement and Compensation: Ensuring full and timely reimbursement and compensation for any unlawful wage withholdings, unpaid overtime, or exploitative fees incurred.



Legal Assistance and Advocacy: Provision of appropriate legal support or referrals for affected individuals to address immigration or labour rights issues, especially in cases where individuals were coerced or trafficked.



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.

70. Remedial action for a supplier can involve the development, implementation and completion of a Corrective Action Plan (**CAP**). Our Operations and Compliance teams will work closely with the supplier to implement the CAP, including providing support to ensure timely compliance. Termination of a supplier contract for serious and persistent non-compliance with a CAP will usually be considered only following a responsible exit strategy to minimise harm to workers.



Assessing Effectiveness.

How Millennium Assesses Effectiveness.

71. As Millennium's overall anti-slavery framework continues to mature and expand, we prioritise an approach to measuring effectiveness driven by the following underlying principles:

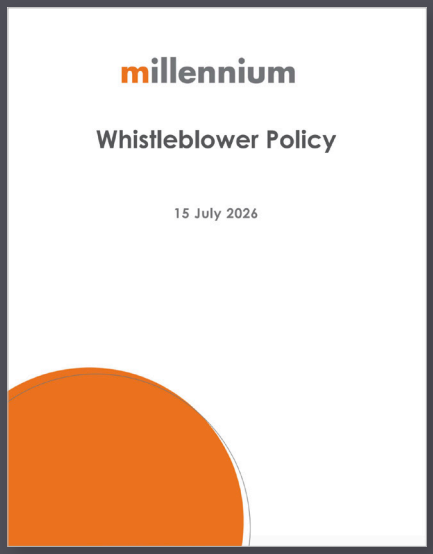
- Early and on-the-ground detection of red flags and critical concerns, prior to potentially vulnerable members of our workforce being unacceptably put at risk.
- Ensuring actions and improvements are occurring across all key pillars including **Risk Identification**, **Supplier Engagement**, **Due Diligence**, **Policy & Governance**, **Training**, Grievance and Remedial Mechanisms, and External Collaboration
- Candid acknowledgement of areas where we have not achieved all that was planned, or actions have not achieved foreshadowed outcomes.

72. In relation to the first issue, Millennium considers early detection (and exclusion) of an unscrupulous labour hire provider prior to any contractual engagement, along with the actual use of our grievance procedures during the reporting period, to be positive indicators of effective risk mitigation. Both actions are described in more detail earlier in this Statement.

73. In terms of pillar-by-pillar analysis, the following Table provides a summary:

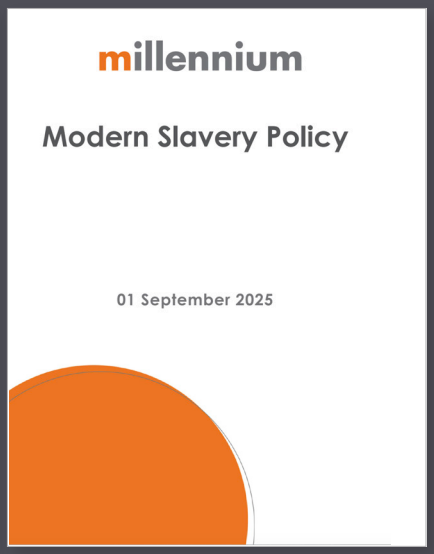
Planned Action Item in Last Year's Statement		Progress Update
Risk Identification	Annual assessment of modern slavery risks through Donesafe contractor onboarding and Informed 365.	Complete This is an annual process which will continue.
Due Diligence	Continued onboarding of suppliers into the HSI Donesafe Contractor Management System.	Ongoing Complete the migration of all suppliers from the old Share-Point system to Donesafe. Donesafe remains the source of truth for contractor prequalification and management.

Planned Action Item in Last Year's Statement		Progress Update
Policy and Training	Complete the full re-design of modern slavery training modules for both management and frontline staff. *(See page 35 of FY25 Statement)*	Partially Complete. A bespoke Modern Slavery training module for managers (and above), and key administrative positions was developed. Bespoke material for frontline staff is still in development.
	Roll-out of internal training modules by end of 2025 for managers, frontline staff and subcontractors.	Partially Complete. Fully revised Modern Slavery training modules for supervisors /managers) and key administrative positions is pending full implementation.
Supplier Engagement	Roll-out of new supplier education modules.	In Progress
Grievance Mechanism	Roll-out of worker-facing whistleblower posters (with QR codes linking to STOPline and multilingual support) across all operational sites. *(See page 30 of the FY25 Statement)*	Completed and ongoing. Posters are now deployed to sites as part of the mandatory suite requirements. A new "Onsite Safety Signage and Mandatory Information Procedure" prescribes information to be retained at all sites.
Identify and participate in Industry Networks and Forums	Obtaining membership with UN Global Compact Network Australia.	Completed and ongoing. Attained membership of the UNGC AU.
	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.	Millennium's People and Risk Committee remains committed to establishing a partnership that engages and trains survivors in paid cleaning positions. This initiative was deferred due to unforeseen circumstances in early 2026 and is now being progressed with an alternative provider, with the intention of establishing a viable pathway during FY27.


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Whistleblower Policy

15 July 2026


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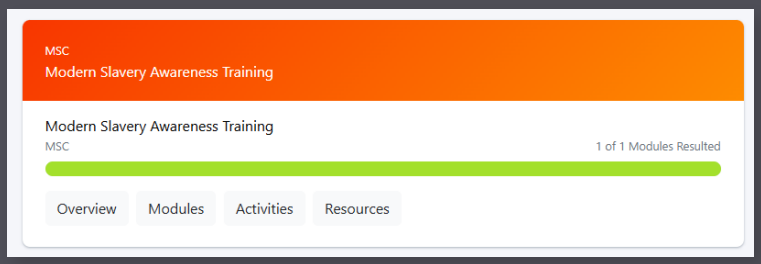
Modern Slavery Policy

01 September 2025


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Onsite Safety Signage and Mandatory Information Procedure

25 June 2026


MSC

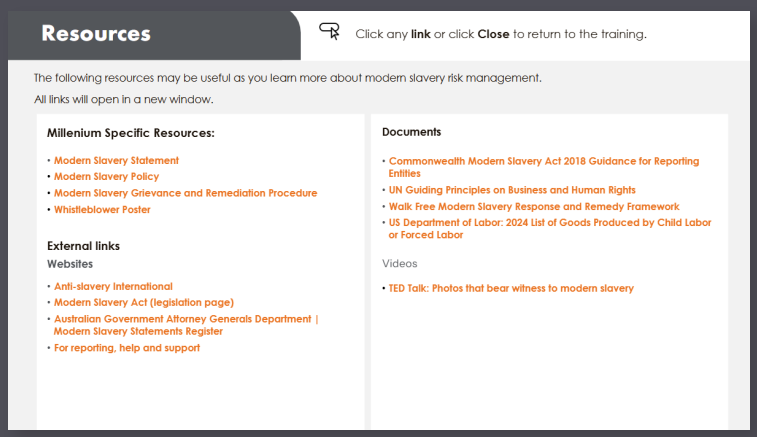
Modern Slavery Awareness Training

Modern Slavery Awareness Training

MSC

1 of 1 Modules Resulted

Overview | Modules | Activities | Resources


Resources

Click any **link** or click **Close** to return to the training.

The following resources may be useful as you learn more about modern slavery risk management.

All links will open in a new window.

Millenium Specific Resources:

- Modern Slavery Statement
- Modern Slavery Policy
- Modern Slavery Grievance and Remediation Procedure
- Whistleblower Poster

External links

Websites

- Anti-slavery International
- Modern Slavery Act (legislation page)
- Australian Government Attorney Generals Department | Modern Slavery Statements Register
- For reporting, help and support

Documents

- Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities
- UN Guiding Principles on Business and Human Rights
- Walk Free Modern Slavery Response and Remedy Framework
- US Department of Labor: 2024 List of Goods Produced by Child Labor or Forced Labor

Videos

- TED Talk: Photos that bear witness to modern slavery


WHISTLEBLOWER REPORTING

At Millennium we are committed to a safe, fair, and ethical workplace for all employees, contractors, and stakeholders.

We encourage a culture where everyone feels supported to speak up against misconduct. We do not tolerate unethical, unlawful, or improper behaviour and are committed to upholding community expectations, legal obligations, and our Code of Conduct.

Whistleblower Program

Millennium partners with **STOPLINE** to provide an **independent, confidential, and secure** channel for reporting concerns — anonymously if preferred.

STOPLINE does not use caller ID, and electronic communications remain confidential. Reports can be submitted online or via smartphone, in multiple languages, and are managed by trained consultants.

Whether you're unsure or have clear evidence, **your voice matters.**

What Can Be Reported?

You are encouraged to report any concerns about:

- Health and safety risks.
- Wages, entitlements or working conditions
- Employment awards.
- Coercion, abuse, or intimidation.
- Sexual harassment or discrimination.
- Misconduct or unethical behaviour.
- Illegal or corrupt activity.
- Modern Slavery.
- Breaches of company policies or Code of Conduct.
- Any other issue you believe is unfair or improper.

How to Report

You can contact STOPLINE in the following ways:

- **Smartphone:** QR Code
- **Email:** millennium.stoplinereport.com
- **Phone:** (Australia): 1300 30 45 50
- **Phone:** (New Zealand): 0800 425 008
- **Mail:** Millennium c/o STOPLINE Locked Bag 8, Hawthorn, VIC.
- **Website:** http://millennium.stoplinereport.com

Our Commitment

Upholding our Code of Conduct is vital to achieving our vision, mission, and business objectives. We are committed to protecting your identity and your right to report wrongdoing without fear of retaliation. Your reports help us maintain a workplace where **integrity, safety, and fairness come first.**

Copies of the **Employee Code of Conduct Handbook**, **Supplier Code of Conduct**, and **Whistleblower Policy** are available at every workplace.

"Feel safe and help others feel safe –report improper conduct or inappropriate behaviour".

— Royce Galea, CEO

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UN GLOBAL COMPACT

2026 PARTICIPANT

Our company is committed to upholding the Ten Principles of the **United Nations Global Compact**. Please refer to our **Communication on Progress.**


Company Information

Company

Millennium Services Group Limited

millenniumsg.com

Type:
Company

Country:
Australia

Sector:
Industrial Support Services

Sub-sector:
Security Services

Ownership:
Privately Held

Global Compact Status:
Active

Participant Since
31 January 2025

Letter of Commitment

Next Communication on Progress (COP) due on:
31 July 2027

Share Profile

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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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