



SECURECORP

**Modern Slavery
Statement**

CY23

Statement from our Managing Director

This is Securecorp Pty Ltd (Securecorp)'s fourth Modern Slavery Statement covering the Australian Calendar Year from 1 January 2023 – 31st December 2023 (CY23) published in accordance with the *Modern Slavery Act 2018* (Cth) (the Act).

This CY23 Modern Slavery Statement reflects Securecorp's commitment, values, and responsibility to support and respect the protection of internationally proclaimed human rights, and to make an enduring and positive contribution to the health and wellbeing of our team, employees, clients, and the communities we work and live in.

The Securecorp group of companies (Group), is submitting a Joint Statement, covering all entities over which the parent entity has control for accounting purposes (collectively referred to as 'Securecorp', 'Group', 'us', 'we' or 'our'). This includes the following subsidiary entities of the Company which are identified as reporting entities under the Act.

Securecorp Pty Ltd group of companies (Group), include the following active entities:

- Securecorp Pty Ltd
- Securecorp (Vic) Pty Ltd
- Securecorp (NSW) Pty Ltd
- Securecorp (Qld) Pty Ltd
- Securecorp (SA) Pty Ltd
- Securecorp (Tasmania) Pty Ltd
- Securecorp (WA) Pty Ltd
- Securecorp (NT) Pty Ltd
- Australian Guarding Services Pty Ltd
- Securecorp Protective Services Pty Ltd
- Secureclean Pty Ltd
- Secureclean (NSW) Pty Ltd
- Secureclean (Qld) Pty Ltd
- Secureclean (SA) Pty Ltd
- Secureclean (Tas) Pty Ltd
- Secureclean (WA) Pty Ltd
- Securemonitoring Pty Ltd
- Secure Electronic Services Pty Ltd
- Secure Group Management Pty Ltd
- Secure (NZ) Ltd



OUR VALUES



RELIABILITY



INTEGRITY



RESULTS

and Current Dormant entities:

Securearmed Pty Ltd
Secureevents Pty Ltd
Securemetro Pty Ltd
Securemetro Cleaning Services Pty Ltd
IPatrol Pty Ltd
Securecorp Risk Management Services Pty Ltd
Securelearning Pty Ltd
Securerobot Pty Ltd
Securescan Global Pty Ltd
Mobigo Australia Pty Ltd

On behalf of the Securecorp Group, I present this statement as a reflection of the efforts that our Risk, Safety, and Compliance Team, and the Securecorp Executive Board have undertaken to diligently review and provide feedback on its content. This Statement has been approved by the Securecorp Board as defined by the *Modern Slavery Act (2018)* (Cth) before being signed by Securecorp's Managing Director on the 28th of June 2024.

Signed By:



Harm (Harrie) Veerman
Securecorp Managing Director
28th June 2024

Mandatory Criteria

Mandatory Criteria		Page Number/s
Requirement 1	Identify the reporting entity	Page 2 & 3
Requirement 2	Describe the reporting entity's structure, operations, and supply chains	Pages 6, 7, & 8
Requirement 3	Describe the risks of Modern Slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Page 9, & 10
Requirement 4	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Page 11
Requirement 5	Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks.	Page 13 & 14
Requirement 6	Describe the process of consultation on the development of the Statement with any entities the reporting entity owns or controls (a joint Statement must also describe consultation with the entity covered by the Statement).	PP. 8, 9, 11 & 12
Requirement 7	Any other information that the reporting entity, or the entity giving the Statement, considers relevant.	Pages 14 & 15





Signed By:



Harm (Harrie) Veerman
Securecorp Managing Director
28th June 2024

About Securecorp

Securecorp are a leading national provider of Security, Electronics, Monitoring, Cleaning, and Integrated services. Since its 1998 inception as a Victorian-based Security and Risk Management business, Securecorp has robustly expanded operations into a nationwide group of companies attentively delivering the following range of professional services.

 <p>Security Manpower</p> <p>Securecorp provides security manpower services across a vast range of market sectors, including Retail, Commercial, Government, Events, Transport and Education</p>	 <p>Cleaning Services</p> <p>Provision of cleaning services to Aviation, Retail and Commercial sectors</p>	 <p>Electronic Security Installation and Maintenance Services</p> <p>Provision of electronic security Installation and maintenance services</p>	 <p>Alarm Monitoring & Response Service</p> <p>Grade A1 Monitoring Centre that is ASIAL certified</p>
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Securecorp is highly cognisant of the inherent risks associated with increasing globalization, and the diversification of supply chains. Accordingly, our organisation safeguards our business against Modern Slavery occurring within our operations, supply chains, and throughout all other related relationships.

This Modern Slavery Statement applies to all persons working for or on behalf of Securecorp, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and all third-party representatives. It is a requirement for all who have, or seek to have, a business relationship with Securecorp, to familiarise themselves with our Modern Slavery Policy (Policy), and to act consistently with its values accordingly.

Securecorp will only engage with organisations who comply with our Policy, and those who are taking verifiable steps towards compliance.

Securecorp require all colleagues to collaboratively assist in managing our Modern Slavery risks, and to remain vigilant of all Modern Slavery threats within the scope of our business operations and relationships.

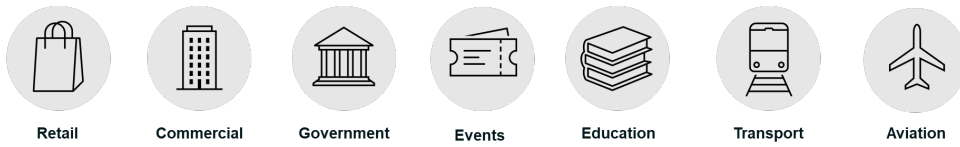
Our organisation is committed to ensuring compliance with the requirements of the Act, and our reporting obligations.

Structure, Operations & Supply Chains

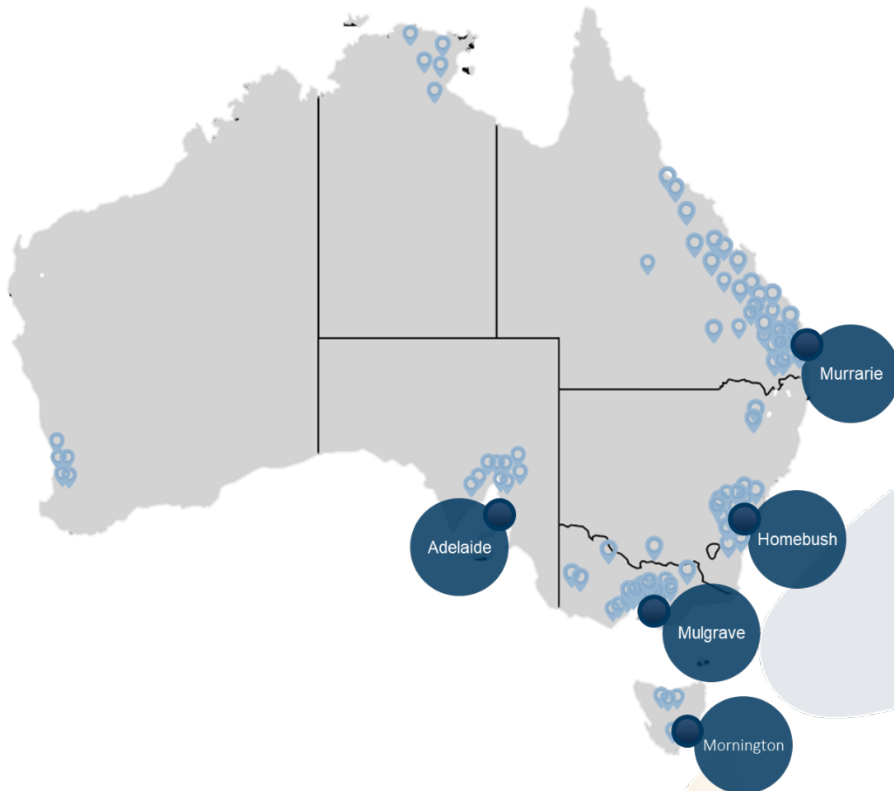
Structure

Securecorp is a nationwide group of companies that deliver a full range of professional services. Our head office is located in Mulgrave Victoria, with a total of five state-based offices.

Our Markets



Our Reach



Operations

Securecorp actively encourages a collaborative approach to managing Modern Slavery. Our organisation ensures that each entity we own, or control, is highly cognisant of the critical actions essential to effectively manage their Modern Slavery risks. Securecorp utilises a collective approach that considers each entities relationship with the other, and the risk profiles relative to that relationship.

Accordingly, Securecorp ensure that the Modern Slavery risks relative to each entity we own, or control have been appropriately identified, assessed, and addressed, and that each entity is aware of the operational controls necessary to effectively manage those risks. Our Organisation and Governance Structure is represented by the diagram in Figure 1.

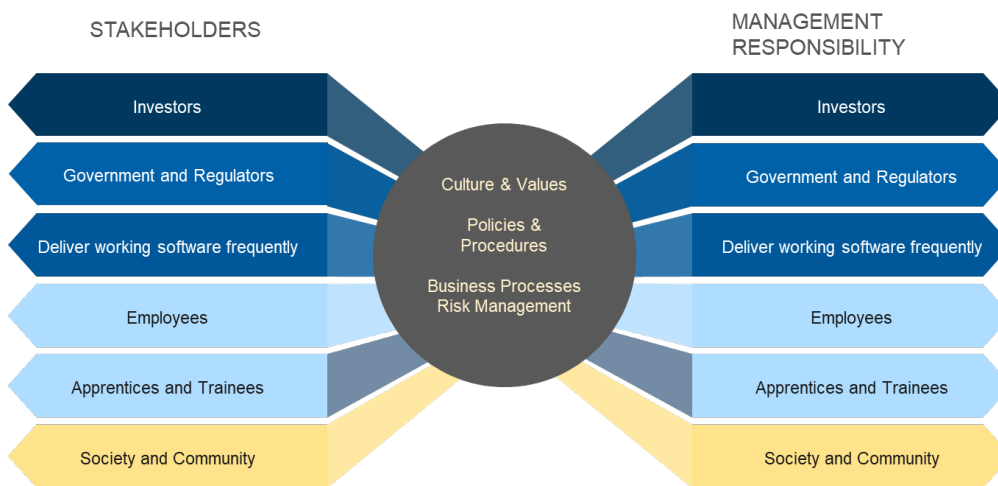


Figure 1 – Securecorp’s Organisation and Governance Structure

Securecorp’s operations are administrated by an experienced executive team, with Securecorp’s Managing Director governing over the day-to-day operations of the Group. Our organisation follows a structured process to ensure that all leadership responsibilities are suitably maintained across all areas of operations.

Securecorp’s executive team regularly engage with our interested parties and stakeholders alike. Our stakeholders include Securecorp’s investors, Government bodies, regulators, employees, apprentices, trainees, and more generally the wider community we operate within. Securecorp’s Corporate Governance is documented in our policies, and procedures, and encouraged throughout the organisation by our values, principles, and a highly intuitive risk intelligence culture.

Supply Chain

Securecorp’s supply chain establishes the goods, services, and labour that contribute to the Company’s own service. Our supply chain includes domestic and internationally sourced services, and a global supply chain consisting of many contracted suppliers.

Our supply chain relationships include suppliers from the following sectors: Cleaning and Integrated Services, Consulting Services, Corporate Clothing, Electronic Security and Installation, Fleet Management, Information Communications and Technology, Logistics and Transport, Marketing, Office

Cleaning, Office Suppliers, Property Services, Recruitment, Security and Alarm Monitoring, Security Services, Training and Professional Development, and Travel.

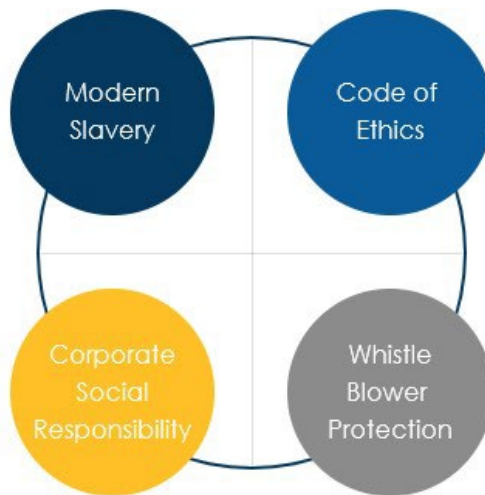
Securecorp is a proud Australian business that is committed to engaging Australian suppliers wherever possible for its Australian operations. Over ninety per cent of Securecorp's total procurement spend is within Australia, of which a considerable portion falls within the State of Victoria. Securecorp recognises that the services that contribute to its own services extend beyond those received from direct suppliers, and that the Group's supply chains also include services used by indirect suppliers.

Securecorp maintains a comprehensive Labour Supplier Management Procedure that effectively communicates our expectations with the minimum standards we place on our suppliers. The Securecorp Group undertake regular compliance audits to ensure that all our suppliers comply with the applicable legislation relative to ethical employment practices and the protection of human rights

Policies and Procedures

Securecorp is highly cognisant of the importance in respecting the protection of internationally proclaimed human rights. In doing so, our organisation is committed to documenting our commitment to protecting the rights of all people. Securecorp's ethical principles and Social Responsibility and Governance related policies apply to all entities owned and controlled by the Securecorp Group.

Modern Slavery in all forms goes against the fundamental ethos that the Securecorp Group advocates for. Accordingly, our organisation duly upholds the key policies, and procedures essential to assisting in the protection of internationally proclaimed human rights. including:



Risk of Modern Slavery in Operations and Supply Chains

Securecorp acknowledges that the risk of Modern Slavery has the potential to eventuate in our operations and supply chains.

Risk Identification Process



Accordingly, Securecorp regularly evaluate our risks, and the effectiveness of our mitigation against causing or contributing to Modern Slavery. Given Securecorp's supply chain is essentially 85% labour based including equipment, consumables, and uniforms, we have determined that diligent Labour Supply Management is crucial to safeguarding our organisation against its primary Modern Slavery threats.

During CY23, Securecorp diligently integrated its findings across the Group by assessing all suppliers using a risk-based approach. Our organisation undertook scheduled compliance audits, surveyed select suppliers, reviewed intelligence gathered from public sources, collaborated with our clients, and showed a strong presence within our industry affiliations.

During Securecorp's diligent CY23 assessment and review of its suppliers, and clients, it did not identify any suspected, or actual instances of Modern Slavery.

Modern Slavery Risks in Our Direct Workforce



The supply of Securecorp's labour provision is largely undertaken through a directly employed workforce. Consequently, the risks of Modern Slavery practices occurring within our direct workforce are relatively low. Irrespective of this determination, Securecorp mitigates against this risk by ensuring that each employee undertakes a robust recruitment process; and that all direct employees work within Australia where employee-employer relations are strictly regulated by the *Fair Work Act 2009* (Cth) and other relevant industrial instruments.

The Modern Slavery risks in Securecorp's direct workforce are addressed within the organisation's Social Procurement framework, ethical behavioural expectations, and the ongoing auditing of minimum wage compliance. Securecorp maintains certified processes that comply with all legal and contractual requirements to effectively manage all workforce entitlements. The Securecorp Group collectively maintains a well-established Integrated Management System (IMS) to assist in providing the highest standards of quality service and administration. Our IMS ensures high-level service delivery of our health and safety commitments and supports our assurance to a culture of continual growth and improvement.

Securecorp's People and Culture team deliver comprehensive training to promote a culture of diversity and inclusion, and to ensure all our workplaces are free from discrimination, harassment, and bullying. Securecorp regularly promote and support good health and well-being and have implemented initiatives to create a sustainable work-life balance for all employees. Our workforce is equipped with business-critical compliance tools and each employee is provided regular support and consultation throughout their employment. Securecorp promotes numerous channels for employees, clients, suppliers, partners, and third parties to report any suspicious, suspected or unethical behaviour or conduct.

Securecorp's ongoing training and awareness equips our workforce to be aware of where Modern Slavery practices have the highest probability of occurring. Our organisation prides itself on cultivating a culture where all legal and regulatory requirements are collectively applied throughout the Group.

Modern Slavery Risks in our Supply Chain



Securecorp will remain vigilant to the fact that Modern Slavery has the potential to exist in our supply chains in numerous ways; including by child labour, debt bondage, forced labour and human trafficking.

Securecorp acknowledges that the following risks exist throughout the organisation's operations, and supply chains:

1. The risk that Securecorp may cause Modern Slavery practices;
2. The risk that Securecorp may contribute to Modern Slavery practices; and
3. The risk that Securecorp may be directly linked to Modern Slavery practices.

Collectively, the Securecorp Group considers the aforementioned third risk as potentially the most probable risk to eventuate. Consequently, our organisation is aware that it may be directly linked to Modern Slavery practices via the actions of other entities we engage or have business relationships with. These relationships include all entities in the Securecorp supply chain, all business partners, investees, and borrowers, non-contractual entities, and also suppliers who maintain the majority of operations outside of Australia. The business relationships not included within this scope are the customers who purchase Securecorp services.

Securecorp have identified that the equipment and/or products within its industry sector, even when procured from Australian companies, are often made in high-risk geographical countries; such as North Korea and India who have a known proclivity for committing human rights violations.

Subsequently, Securecorp have determined that the products and services arising from Labour Supplied Commercial Cleaning, Labour Supplied Security, Electronic Installations, and Print and Promotional Goods sectors, potentially inherit the highest risk of Modern Slavery occurring within their supply chain. As a result, Securecorp accepts that its most probable Modern Slavery risks may at times not align with the volume or cost of the products and/or services procured.

Accordingly, Securecorp are aware of the importance of working with its suppliers in an effort to eliminate Modern Slavery from all respective supply chains. Hence, during CY23, Securecorp undertook a comprehensive survey of over 150 select vendors and suppliers using a risk-based approach of oncosts including equipment, consumables, uniforms, and others.

The Securecorp Group is committed to continually improving its relationships with all interested parties, including other businesses, Government agencies, and suppliers, in order to meet our obligation to collectively combat Modern Slavery.

To date, no non-conformances, or suspected instances of Modern Slavery have been identified throughout our operations or supply chains.

Remediation and Due Diligence

How Securecorp puts its Modern Slavery Management into Practice.

Given the majority of Securecorp's services are delivered from Australia under the diligent supervision of the Group, we have determined the risk of Modern Slavery occurring within our operations is relatively low. However, as foreshadowed above, the Securecorp Group recognise that throughout the inherent landscape of its supply chains, our organisation has the potential to be directly linked, and therefore, implicitly exposed to Modern Slavery practices.

To manage this known risk, Securecorp regularly collaborates with its stakeholders to help identify the potential impacts of its united activities. Securecorp's human rights management processes are designed to assess, identify, prevent and mitigate any adverse impacts that may arise from the Group's activities. Our due diligence duly encompasses consideration of the best practice to address and remediate any actual or potential human rights violations that may occur within our supply chains or operations.

Actions Taken to Assess and Address Risks

Securecorp's assessment of its Modern Slavery exposure is initiated by evaluating the key activities linked to its primary supply chain risks. All labour suppliers are audited prior to any contractual engagement, and carefully selected vendors are diligently surveyed using a risk-based approach. These methods are designed to identify any actual or potential exposure Securecorp may attract via its suppliers' or vendors' standards, practices and business affiliations. If required, Securecorp's remediation process is implemented as documented in the organisation's Labour Supplier Management Procedure, and Modern Slavery Policy.

Findings from Securecorp's labour supplier audits, and all vendor surveys are collectively reviewed before being communicated internally. If necessary, the Group's executive applies a suitable remediation process to effectively address any potential impacts or suspected breaches found. Securecorp's enduring preventative measures include vigilant governance, protective contractual conditions, ongoing auditing, appropriate grievance mechanisms, comprehensive training communication, transparency, and a collaborative approach with all clients.

Given Securecorp is a medium to large Australian enterprise, our organisation is fully cognisant that our ability to use leverage to minimise Modern Slavery risks may be limited when engaging with large conglomerates further down our supply chain. Accordingly, the Securecorp Group regularly monitors, measures, and tracks its performance to determine whether its impacts are being appropriately addressed, and its exposure adequately managed.

The final stage of Securecorp's due diligence process encompasses publicly communicating Securecorp's policy, initiatives, and actions, which includes the publication of this Statement.



Governance

Securecorp considers that good governance is essential to the long-term sustainable success in collectively eliminating Modern Slavery. Good corporate governance is fundamental to Securecorp's cultural principles, and values, of which Securecorp's Top Management are charged with briefing Securecorp's leadership teams regularly and informatively.

Securecorp's culture is encouraged by a robust executive team, in which Securecorp's Managing Director governs over the day-to-day operations; and in exercising this function delegates overall responsibility for assessing and addressing Securecorp's Modern Slavery and human rights risks to the Group's Executive Board; and in exercising this function Securecorp's Executive Board delegate collective responsibility for the implementation of the organisation's Modern Slavery principles, practices, and culture to Securecorp's management, and employees at all levels of the organisation



Contractual Engagements

Securecorp have implemented suitable processes to ensure that all suppliers and contractors comply with Securecorp policies throughout our contractual arrangements, via the Group's social procurement principles.

Securecorp's contractual arrangements require that minimum standards in corporate social responsibility, ethical business practices, safety, and environmental protection are met. In essence, Securecorp's supplier engagement strategy continually improves awareness by clearly communicating our expectations to suppliers at the onset of all contractual engagements.

The Securecorp Group's contractual terms and conditions promote the organisation's commitment to and contribution towards the attainment of broader societal goals; and to the continuous improvement of its approach to taking appropriate responsibility for any adverse social impacts of the organisation's purchasing function.



Grievance and Feedback

Securecorp promote numerous mechanisms for stakeholders, employees, and third parties to anonymously report suspected or actual illegal activities, breaches of human rights, and/or company policies. Comprehensive training in suitable reporting and the appropriate channels is a mandatory requirement in our core inductions modules that each employee and contractor must undertake before commencing engagement.

Securecorp clients, suppliers, and third parties can raise Modern Slavery-related concerns via our webpage <https://www.Securecorp.com.au> Grievances can also be received via direct correspondence, company social media, or through bodies such as the Human Rights Commission, relevant tribunals, and the Department of Home Affairs.

Where concerns are raised, Securecorp will investigate in accordance with all regulatory requirements and applicable policies and procedures. In instances where Modern Slavery is evident, our organisation will direct all contact to the Australian Federal Police (AFP) on 131AFP (131237), and by utilising the [online form to report information regarding human trafficking](#); or make a report, by completing the Border Watch [Reporting Form](#). Securecorp's Dispute Resolution and Grievances Policy and Procedure, and online training ensures that all grievances are managed and investigated in a comprehensive, timely and transparent manner.



Statutory Declarations

Before engagement, Securecorp invite all suppliers to collaboratively work with us to help prevent Modern Slavery occurring throughout our suppliers' operations and supply chains. Our organisation requires all suppliers to sign a statutory declaration or equivalent requesting their commitment to identify their risks and to protect their organisation and supply chain from Modern Slavery practices. Securecorp's intention to collaboratively and collectively combat Modern Slavery with our suppliers is explicitly addressed in all supplier contracts, prequalification's, ongoing auditing, and all supplier related documentation.

Our organisation is well equipped to respond to all suspected occurrences of Modern Slavery ensuing or resulting within its operations and/or supply chains.



Actions taken to date

Securecorp's actions taken to date, to minimise the risks of Modern Slavery occurring within our operations, or supply chains include:

- Ongoing risk based scheduled auditing of all contractors' wages, superannuation, licenses, and insurance
- Scheduled gap analysis of Securecorp's policies and procedures against the Act
- Ongoing assessment of suppliers providing products/services purchased by the company such as corporate clothing, to determine any risks of Modern Slavery
- Ongoing review and assessment of data and information collected from Securecorp's Modern Slavery Supplier and Vendor Surveys
- Mandatory ongoing Code of Conduct and Behaviour, Ethics, Corporate Social Responsibility (CSR), Policy Acknowledgement, Grievance Mechanisms, and Modern Slavery relevant training and development for all employees and subcontractors

Assessing Effectiveness

During CY23 Securecorp undertook ongoing review and assessment of the effectiveness of its Modern Slavery risk management framework with consideration to regulatory guidance and industry standards of practice.

The following demonstrates the activities Securecorp undertook during CY23 to determine the effectiveness of its Modern Slavery risk management:

1. Annual executive review of Securecorp's response to Modern Slavery.
2. Ongoing scheduled auditing of all contractors.
3. Scheduled wage, and superannuation auditing.
4. Review of the investigation process for timely reporting of suspected breaches.
5. Scheduled assessment of risk-based supplier surveys.
6. Internal auditing of risk management processes.
7. Ongoing collaboration with suppliers and clients.
8. Established consultation processes.
9. Training completion rate auditing.
10. Regular engagement and opportunities for feedback.
11. Ongoing review and updates of reporting channels and grievance mechanisms.



Communication and Training

Securecorp's leadership promote a culture of continual improvement of its human rights and Modern Slavery risk management, training, communication, and consultation. The enforcement of Securecorp's policy, is relevant to the strategic importance that each policy has to our business. Accordingly, the key requirement of our Modern Slavery policy are implanted into our organisational culture via educational material that each employee must complete before commencing employment. Given human rights principles are fundamental to Securecorp's core values, it is a requirement that each employee completes an aptitude test, and also re-completes this training annually. The Group's communication, consultation, and training processes are scheduled from operational level through to Top Management and are designed to collaboratively raise the awareness of our contractors, our leadership team, and all employees of each entity within the Group.

During CY23, Securecorp continued the transition and augmentation of its training platform and curriculum. Our online Code of Ethics and Professional Behaviour and Conduct curriculum is designed to increase organisational awareness of how we actively manage our Modern Slavery risks; and the risks that may exist through another entity's activities within our supply chain. Our training provides the definition of Modern Slavery as defined under the Act and describes the potential areas where Securecorp are most likely to be exposed to human rights concerns. Our policy-based procedural training documents Securecorp's commitment to remaining vigilant to all Modern Slavery risks throughout our business relationships, and how to remediate, or report any suspected breaches and associated wrongdoings.

Securecorp promotes a culture that ensures all colleagues receive sufficient training and support relevant to the applicable scope of their responsibilities within the organisation



LOOKING FORWARD

Further to our commitments in this Statement, Securecorp will continue undertaking the following Modern Slavery initiatives over the course of the 2024 Calendar year:

Securecorp will –

- Maintain scheduled executive reviews of its response to Modern Slavery.
- Continue to undertake ongoing scheduled compliance audits of all contractors.
- Carry out timely investigation of all reported or suspected breaches.
- Continue to conduct scheduled wage, and superannuation audits.
- Continue to undertake scheduled assessments of risk-based supplier surveys.
- Maintain ongoing review of the relevant reporting channels and grievance mechanisms.
- Continue to conduct internal audits of our risk management processes.
- Continue providing informative, relevant, and appropriate training to all employees.

All entities within the Securecorp Group including the parent entity Securecorp have been engaged in the production of this Statement and in the assessment of our operational and supply chain Modern Slavery exposure. Securecorp have conducted comprehensive internal consultation with key stakeholders across the leadership and management teams in producing this Statement.

Ongoing Commitment

This Statement plays an integral part of our communication, and consultation with our internal and external stakeholders. The content within this Statement is vital to documenting Securecorp's ongoing commitment to continue conducting human rights due diligence. Securecorp's approach to remaining vigilant to the risks of Modern Slavery is to:

- Remain transparent about our known risks and challenges relative to Modern Slavery.
- Disclose all potential and actual risks of Modern Slavery.
- Ensure continuous improvement of our ethical business practices and social responsibilities.
- Assure that all policies and procedures, including this Statement and our Modern Slavery Policy remain current and relevant.