SECURECORP

Modern Slavery Statement

CY21

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Contents

Statement from our Managing Director

I am pleased to present Securecorp's second Modern Slavery Statement covering the Australian Calendar Year from 1 January 2021 – 31st December 2021 (CY21) published in accordance with the *Modern Slavery Act 2018 (*Cth*)* (the Act).

This FY21 Modern Slavery Statement reflects our organisational commitment, values, and responsibility to make an enduring and positive contribution to the health and wellbeing of our team members, customers, and the communities we work and live in.

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'), including 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
Securemetro 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
Securemetro Cleaning Services Pty Ltd
Securemonitoring Pty Ltd
Secure Electronic Services Pty Ltd
Securetraining 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
IPatrol Pty Ltd
Securecorp Risk Management Services Pty Ltd
Securelearning Pty Ltd
Securerobot Pty Ltd
Securescan Global Pty Ltd
Mobigo Australia Pty Ltd

This Statement outlines the actions undertaken by Securecorp during CY21 to assess and address Modern Slavery risks in our operations and supply chain.

This Modern Slavery Statement was circulated to the Securecorp Executive Team and approved by the Securecorp Board as defined by the *Modern Slavery Act 2018* (Cth) before being signed by Securecorp's Managing Director on the 29 June 2022.

Signed By:

Harm (Harrie) Veerman
Securecorp Managing Director

Addressing COVID-19 Impacts

Throughout 2021 the effects of the COVID-19 pandemic persisted globally, with the ramifications of this infection continuing to affect the local and global workforce, through areas like:

- job instability and loss of income (reduced locations and hours of work)
- border closures and travel restrictions (inability to visit family and/or return to places of work)
- excessive overtime (due to reduced availability to the skilled workforce)

Securecorp implemented protective and preventative measures to safeguard our team:

- Regular release and updates to our COVIDSafe Plan
- Investment in COVID-19-related safeguards, including PPE and hand sanitiser, to protect our team members and the broader community
- Vaccine Incentive Program
- Employee Rapid Antigen Test (RAT) Reporting Policy
- Training on COVID-19 and safe practices to mitigate the spread of the disease

Through the development of this pandemic, we have learnt further ways to partner with our clients and strengthen our networks with workers and subcontractors, implementing a consultative infrastructure, supporting information sharing and risk mitigation across our whole organisation to address the ongoing and evolving risks of COVID-19.

- **Labour Hire** –

COVID-19 presented significant and rapidly changing legal requirements such as mandatory vaccinations, mask-wearing, and QR checking. These requirements resulted in an increase in demand for resources in some sectors as well as a reduction across others that experienced extended lockdowns.

Securecorp's CY20 reduction in the reliance on subcontractors was tested during this time with an increased requirement across some sectors which required Securecorp to continue its review of compliance by its Suppliers.

About Securecorp

Securecorp are a leading national provider of security, cleaning, and integrated services. First established in 1998 as a Victorian-based security and risk management business, Securecorp has since grown to a nationwide group of companies delivering a full range of services, including:

Security Manpower

Securecorp provides security manpower services across a vast range of market sectors, including Retail, Commercial, Government, Events, Transport and Education

Cleaning Services

Provision of cleaning services to Aviation, Retail and Commercial sectors

Electronic Security Installation and Maintenance Services

Provision of electronic security Installation and maintenance services

Alarm Monitoring & Response Service

Grade A1 Monitoring Centre that is ASIAL certified

Securecorp recognises its growth since its establishment in 1998 and the increasing globalization and diversification of its supply chains, and as such is committed to limiting the risk of Modern Slavery occurring within its own business, infiltrating its supply chains or through any other business relationship.

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 any other third-party representative. Further, Securecorp has an Anti-Slavery Policy (Policy) and Securecorp expects all who have or seek to have, a business relationship with our company, to familiarise themselves with the Policy and to act in a way that is consistent with its values.

Securecorp will only do business with organisations that fully comply with the Policy or those who are taking verifiable steps towards compliance.

Tackling Modern Slavery requires colleagues to play a part and remain vigilant to the risk in all aspects of Securecorp's business and business relationships.

Securecorp is committed to being compliant with the requirements of the Act, including reporting obligations.

Securecorp's Structure, Operations & Supply Chains

Structure and Operations

Securecorp is a nationwide group of companies delivering a full range of services. Securecorp's head office is located in Mulgrave Victoria, with a total of five state-based offices.

Our Markets

Retail   Commercial   Government   Events   Education   Transport   Aviation

Our Reach

5 Office Locations

2,800 Staff

500+ Sites

Murrarie

Adelaide

Homebush

Mulgrave

Mornington

Securecorp takes a collaborative approach to combatting Modern Slavery, including ensuring that all relevant areas of its entity and any entities it owns and controls, are aware of what actions they need to take and that Modern Slavery risks relating to these areas and entities have been identified, assessed, and addressed.

Securecorp consults with the entities it owns and controls to a degree that reflects its relationship with the other entities and the risk profiles of those entities. Securecorp considers this consultation sufficient to ensure that the Modern Slavery risks relating to the other entity have been appropriately identified and that another entity is aware of what actions it needs to take.

In summary, Securecorp's Organisation and Governance Structure can be represented by the diagram in Figure 1.

Figure 1 – Securecorp's Organisation and Governance Structure

Securecorp is led by a leadership team with the Securecorp Managing Director overseeing the day-to-day operations of the company. Delegation of authority principles exists to enable leadership across all parts of the business.

Management responsibility interacts and is accountable to stakeholders on a day-to-day basis. These stakeholders include Securecorp's investors, the Government, regulators, employees, apprentices, trainees and more generally the wider community.

Overarching Securecorp's organisation and governance structures are its policies and procedures, culture and values and business processes and risk management.

Supply Chain

Securecorp appreciates it supply chain constitutes the goods and services (including labour) that contribute to the Company's own services, including services sourced in Australia or overseas.

Securecorp has a global supply chain made up 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.

As a proud Australian business, Securecorp is committed to engaging Australian suppliers wherever possible for its Australian operations. Over approximately ninety per cent of Securecorp's total procurement spend is within Australia, including a considerable portion within the State of Victoria.

Securecorp recognises the services that contribute to its own services extend beyond those received from direct suppliers. Securecorp's supply chain also includes services used by indirect suppliers.

Policies and Procedures

Securecorp understands the importance of protecting human rights and is committed to protecting the rights of all people. Modern Slavery goes against everything Securecorp stands for. Securecorp has key policies and procedures in place to assist in protecting human rights, including:
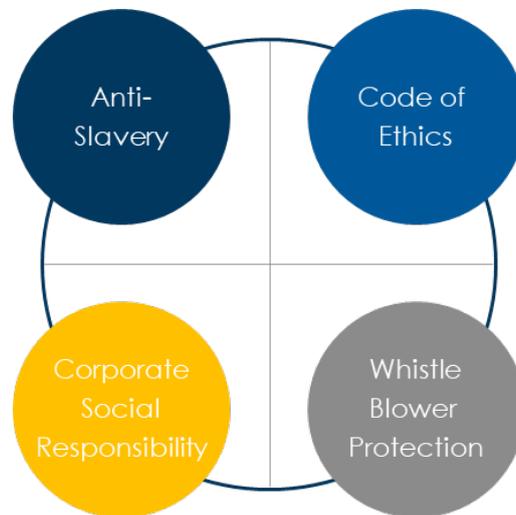
Additionally, Securecorp's Labour Supplier Management Procedure communicates the expectations and minimum standards we place on our suppliers, including compliance with all applicable legislation in relation to employment practices and respecting and supporting human rights.

The above governance structure and policies apply to all entities owned and controlled by the Group.

Risk of Modern Slavery in Operations and Supply Chains

Securecorp recognises that Modern Slavery risks can occur in our operations and supply chains.

Risk Identification Process

Risk assessments were conducted to identify and prioritise Securecorp's efforts. Securecorp's supply chain is fundamentally labour based (>85%), followed by oncosts including equipment, consumables, uniforms, and others. It follows that Labour Supply was to be our priority, followed by oncosts.

Suppliers of oncosts were assessed during CY21, using risk-based tools such as questionnaires as well as intelligence gathered through public sources, discussions with suppliers, clients, and industry affiliations.

During CY21, Securecorp continued our review and assessments of our suppliers and has not identified any instances of Modern Slavery.

During CY21, Securecorp undertook a comprehensive survey of its top 150 suppliers of oncosts including equipment, consumables, uniforms, and others. To date, no non-conformances have been identified.

Modern Slavery Risks in Our Direct Workforce

Securecorp's labour provision is predominantly through a directly employed workforce. We consider the risks of Modern Slavery practices within our direct workforce are low, as our employees go through a rigorous recruitment process and work in Australia, where employee-employer relations are strictly regulated by the *Fair Work Act* 2009 (Cth) and relevant industrial instruments.

Modern Slavery risks that relate to our direct workforce and operations are evaluated in the context of our people-centric policies and practices, ethical standards, behavioural conduct requirements as per our Code of Ethics and meeting minimum wage obligations. Securecorp maintains internal systems and processes to comply with our legal and contractual obligations and to manage entitlements relating to our workforce. We also maintain a mature Integrated Management System (IMS) meeting the high-quality standard and providing a fundamental basis for our service delivery methods, exceeding our clients' expectations, and doing 'the ordinary things exceptionally well. We deliver this through the quality of our processes, controls, job management and performance evaluation, where we focus on continual improvement, delivering best practice outcomes and client satisfaction. Our IMS also supports a high level of health and safety engagement, reporting, auditing, and proactivity aligning with the growth and commitment to our people and safety culture.

Our People and Culture team drive programs and training, promoting diverse and inclusive workplaces which are free from discrimination, harassment, and bullying; support good health and well-being and work-life balance. Our teams are aware of the processes of how to communicate and are consulted throughout their employment and have systems in place to report on any behaviour or conduct that is suspicious or unacceptable.

These programs and legal adherence, collectively help Securecorp to be a supportive, thriving workplace, that minimise the risk of Modern Slavery practices.

Modern Slavery Risks in our Supply Chain

Modern Slavery has the potential to exist in Securecorp's supply chains in a number of ways, including by child labour, debt bondage, forced labour and human trafficking.

Securecorp appreciates the following risks in its operations and supply chains:

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

Securecorp considers the third risk is most likely (if any), in that Securecorp may be directly linked to Modern Slavery practices. Securecorp is highly aware of the risk that its operations and services may be connected to Modern Slavery through the activities of another entity Securecorp has a business relationship with, including those suppliers which maintain most operations outside Australia. These business relationships include all entities in the Securecorp supply chain, including entities with which Securecorp does not have a contractual relationship. It also includes all business partners, investees, and borrowers but does not include customers who purchase Securecorp services.

Securecorp considers services arising from Labour Supplied Commercial Cleaning, Labour Supplied Security, Electronic Installations and Print and Promotional Goods sectors, to be of the highest risk of Modern Slavery in Securecorp's supply chain. Securecorp appreciates its most severe Modern Slavery risks may not align with the volume or cost of the products and services procured.

Further, Securecorp recognises that equipment or products although procured from Australian companies are made in countries such as North Korea, India, and other countries identifies as a high geographical risk.

Securecorp is committed to continually improving how they work with business, government, suppliers, and society to meet moral and ethical obligations to combat Modern Slavery and human trafficking. Securecorp is strongly committed to working with its suppliers to eliminate Modern Slavery from its supply chain.

During CY21, Securecorp undertook a comprehensive survey of its top 150 suppliers of oncosts including equipment, consumables, uniforms, and others. To date, no non-conformances have been identified.

Due Diligence and Risk Management

How Securecorp has put our Anti-Slavery Policy into practice

As a leading security services organisation, Securecorp considers the risk of Modern Slavery within its direct business operations to be low, particularly given the majority of Securecorp services are delivered from Australia under the supervision of Securecorp management and employees. However, as foreshadowed above, Securecorp recognises its supply chain and customers can be indirectly exposed to Modern Slavery and human trafficking risks.

Securecorp works with its stakeholders to identify and understand the impacts of its activities. Due diligence is implemented to prevent and mitigate adverse impacts arising from Securecorp's activities.

This due diligence refers to an ongoing management process to identify, prevent, mitigate, and account for how Securecorp addresses actual and potential adverse human rights impacts in its operations and supply chains.

The due diligence process is initiated by risk identification and assessment of suppliers prior to any contracting. Securecorp has implemented risk management processes to identify, monitor, assess and mitigate potential risk areas where Securecorp could be exposed to human rights concerns.

Securecorp then integrates findings from the risk assessment across the organisation and, where applicable, the Group, taking actions, as appropriate, to address impact. These include measures through good governance, contractual arrangements, access to remedies through effective grievance mechanisms, training and communications, and the use of statutory declarations. These measures are discussed in more detail below. Securecorp being a medium/large Australian enterprise understands its ability to use its leverage to minimise Modern Slavery risks may be limited (although less limited than small enterprises), particularly when engaging with large conglomerate organisations further down its supply chain.

Securecorp is tracking its performance to consider whether impacts are being addressed and are currently conducting internal audits of its supplier screening processes.

The final part of Securecorp's due diligence process involves publicly commenting on Securecorp's actions, which includes the publication of this Statement.

Governance

Good governance is essential to long-term sustainable success in eliminating Modern Slavery. Good governance is ingrained at Securecorp and is the collective responsibility of all levels of management and even more widely extends to all employees. The risk of Modern Slavery in Securecorp's operations and supply chain is assessed within Securecorp's corporate-wide governance and risk management framework. Responsibility for assessing and addressing Modern Slavery risks has been assigned to a senior manager, and Securecorp's leadership team is briefed regularly and appropriately.

Contractual Arrangements

Through contractual arrangements and procurement principles, Securecorp's suppliers and contractors are required to comply with Securecorp policies wherever possible. Securecorp's standard terms and conditions also require minimum standards in corporate social responsibility, ethical business practices, safety, and environmental protection.

Grievance and Feedback

Securecorp has several mechanisms for stakeholders and other third parties to anonymously report suspected or actual illegal activities, breaches of human rights, and/or company policies.

In addition, Securecorp clients, suppliers, and third parties can raise Modern Slavery-related concerns via our webpage https://www.Securecorp.com.au/en/

Grievances can also be received via direct correspondence, social media or through bodies such as the relevant Human Rights Commission or other tribunals, and the Department of Home Affairs.

Where concerns are raised, Securecorp will investigate in accordance with regulatory requirements and applicable policies and procedures. In instances where Modern Slavery is evident, our organisation will refer to the Department of Home Affairs' Modern Slavery Response Protocol which steps out how to appropriately respond to and report suspected cases of Modern Slavery cases. Securecorp's grievance procedures ensure all grievances are managed and investigated in a comprehensive, timely and transparent manner.

Statutory Declarations

Before engagement, Securecorp asks any suppliers, where possible, to sign a statutory declaration (or equivalent) representing an additional commitment to work with Securecorp to reduce Slavery from its organisation and supply chain. If this is not possible, Securecorp clearly communicates its expectations to suppliers, including by ensuring that Modern Slavery issues are specifically addressed in supplier contracts, prequalification, and other relevant mechanisms.

Securecorp are well prepared to respond to all suspected instances of Modern Slavery occurring in its operations and/or supply chains.

Actions taken to date

Actions taken to date, to minimise the risks of Modern Slavery within Securecorp include:

- preparing to commence investigations into suppliers providing products/services purchased by the company such as corporate clothing, to determine any risks of Modern Slavery; and

- undertaking a gap analysis of Securecorp's current policies and procedures against the Act.

- ongoing reviews of data collection from information received via Modern Slavery Supplier Surveys

Assessing Effectiveness

Securecorp continues to assess the effectiveness of its actions in comparison to industry standards and practices.

There are a range of ways Securecorp demonstrates how they assess the effectiveness of its actions, including:

1. An established process to regularly review the actions they have taken. This includes an annual leadership team review of Securecorp's response to Modern Slavery.
2. Regularly checking risk assessment processes to ensure they remain current.

3. Established processes to provide for regular engagement and feedback.
4. Conducting internal audits and/or monitoring of specific steps Securecorp has taken to assess and address Modern Slavery risks.
5. Investigating any reports of suspected breach of the Act.
6. Tracking the actions taken and measuring the impact.
7. Working with suppliers to check how they are progressing, including any actions they have put in place to address Modern Slavery risks.
8. Corporate Governance. The executive team to have oversight of the Modern Slavery Statement and all actions taken.

Communication and Training

We have communicated our intentions and consultative approach regarding process of risk identification and assessment of suppliers, to all entities within the Group. This communication and consultation were initially delivered and will continue to be maintained, through correspondence and Executive Meetings.

Further to this, across 2021-2022, Securecorp employees have completed risk awareness training which included information on Modern Slavery. New employees will be required to undertake this training.

Modern Slavery requirements and updates have been communicated to all Securecorp employees during team meetings and onsite training sessions to ensure compliance with our Policy across Securecorp's entire business.

Executives ensured that relevant colleagues receive adequate training on our Policy and any supporting processes applicable to their role.

Mandatory Criteria

The following table identifies the page numbers that address each of the mandatory criteria in section 16 of the Act:

Mandatory Criteria	Page Number/s
A. Identify the reporting entity	Page 4
B. Describe the reporting entity's structure, operations, and supply chains	Pages 8 & 9
C. 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 11
D. 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 & 12
E. Describe how the reporting entity assesses the effectiveness of these actions.	Page 14
F. 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).	Page 9 & 15
G. Any other information that the reporting entity, or the entity giving the Statement, considers relevant.	Pages 15 & 16

Signed By:

Harm (Harrie) Veerman
Securecorp Managing Director
29 June 2022

Looking forward

Further to our commitments in this policy, Securecorp aims to continue with the following measures over the course of the Calendar year in 2022:

a) Securecorp will continue to collect data (from questionnaires and consultation) and conduct risk assessments to determine which parts of our Tier 1 supply chains (i.e., manufacturers who provide products directly to Securecorp) are most at risk from modern slavery.

b) Where possible, Securecorp will continue to engage directly with our suppliers with respect to this Policy to understand the measures, they have in place to mitigate modern slavery within their own operations.

c) When we assess new contracts, we will request wording to specify prohibition on trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour services; and all forms of child labour.

d) Our organisation's expectations are for our contracted suppliers, to hold their own suppliers to the same standards and we reserve the right to terminate any contractual arrangement if there is a breach of this policy.

Whilst reporting was led by the parent Securecorp entity, each of the entities have been engaged in the assessment and detection process of assessing operational and supply chain modern slavery exposures. Given all the entities in the group are integrally connected, we conducted an internal consultation process with key stake holders across the leadership team and management in producing this statement.

Ongoing Commitment

This statement is a key part of communicating with our internal and external stakeholders, and our commitment to human rights due diligence. Our approach to this and future statements is to:

- Be transparent about our known risks and challenges in modern slavery.
- Disclose potential and actual risks of modern slavery.
- Focus on continuous improvement and implement improvements across our policies and procedures, including the Policy as required.
- Increase awareness of modern slavery risks within our operations.
- Engage with our highest risk suppliers (if any) on modern slavery risks.