

MODERN SLAVERY STATEMENT

**Australasian
Landscape Services
HoldCo Pty Ltd**

ABN 24 652 220 794

Modern Slavery Statement

Date: 1/12/2023

Reporting Period 1 July 2022 – 30 June 2023

Overview

Modern Slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Walk Free's Global Slavery Index Report 2023 estimates that 50 million people world-wide were living in modern slavery on any given day in 2021, an increase of 10 million people since 2016. This report also states that approximately 41,000 people were living in modern slavery conditions in Australia 2021. Those most at risk include women and children who may have little or no capacity to protect themselves. Australia has agreed with the United Nations to attempt to abolish modern slavery by 2030.

Serious exploitation

There are eight types of serious exploitation which combined make up modern slavery:

1. Trafficking in persons – the recruitment, harbouring, and movement of a person for exploitation through modern slavery
2. Slavery - situations where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way
3. Servitude – situations where the victim's personal freedom is significantly restricted, and they are not free to stop working or leave their workplace
4. Forced marriage – situations where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the marriage ceremony's nature and effect
5. Forced labour - situations where victims are either not free to stop work or not free to leave their workplace
6. Debt bondage – situations, where the victim's services are pledged as security for a debt and the debt is manifestly excessive of the victims' services are not applied to liquidate the debt or the services' length and nature are not limited and defined
7. Deceptive recruiting for labour or services - situations where the victim is deceived about whether they will be exploited through a type of modern slavery
8. Serious exploitation of children and child labour – situations including enslavement, sexual exploitation, used to produce or traffic drugs or exposure to dangerous work (the "worst forms")

Freedom from slavery is a fundamental human right. Under the Australian Government endorsed by the United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles), entities have a responsibility to respect human rights in their operations and supply chains. This responsibility

Modern Slavery Statement

includes taking action to prevent, mitigate and, where appropriate, remedy modern slavery in your entity's operations and supply chains.

Other illegal and harmful practices may be present within the supply chain but are not considered modern slavery. Practices like substandard working conditions or underpayment of workers may indicate more severe exploitation, corruption, and practices that impact human rights.

Modern Slavery Act 2018

The Australian Government's Modern Slavery Act 2018 ("the Act") came into force on 17th of January 2019. The Act establishes a mandatory reporting regime for entities:

- with consolidated revenue of at least A \$100 million in the reporting period, and
- who is either an Australian entity or a foreign entity carrying on business in Australia.

The Act requires reporting of an Annual Modern Slavery Statement. The Statement must identify and address the risks of modern slavery in Green by Nature's operations and supply chains and actions taken to address those risks.

The 7 mandatory criteria require every statement to:

1. Identify the reporting entity
2. Describe the reporting entity's structure, operations and supply chains
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
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
5. Describe how the reporting entity assesses the effectiveness of these actions
6. Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement), and
7. Provide any other relevant information

1. Identifying Australasian Landscape Services HoldCo Pty Ltd (The Reporting Entity)

Australasian Landscape Services HoldCo Pty Ltd ("ALS") and its subsidiaries are providers of landscaping services for facilities, stadiums, parks, and open spaces across the following sectors being government, private sector, education, aviation, and commercial racecourses throughout Australia and New Zealand.

ALS is the owner of the group brand of Green by Nature®, which is a registered trademark. Throughout this document, the name ALS and Green by Nature are used interchangeably to mean Australasian Landscape Services HoldCo Pty Ltd and its subsidiaries. Green by Nature continues to utilise the founding brands of Green Options, Super Gardens, Skyline and Recreational Services.

At Green by Nature, we are committed to operating our business with the highest standards of ethics and social responsibility. We are acutely aware of the grave issues surrounding modern slavery, human trafficking, forced labour, and child labour, and we stand resolute in our determination to eliminate

Modern Slavery Statement

these practices from both our operations and our supply chain. This statement outlines our unwavering dedication to combatting these issues within Green by Nature and throughout our supply chain.

The Modern Slavery Act 2018 (the Act) requires businesses and organisations to identify and address their modern slavery risks, and to maintain responsible and transparent supply chains. Along with other Australian organisations, Green by Nature will be required to prepare an annual Modern Slavery Statement which will be made publicly available.

Modern slavery breaches the most fundamental freedoms and human rights of individuals. Green by Nature is committed to respecting human rights, acting ethically in our dealings with partners and suppliers, and implementing action to address any modern slavery risks within Green by Nature's direct control.

2. Describing ALS's entity's, structure, operations, and supply chains.

2.1 Structure

The ALS Corporate Structure includes the ultimate parent entity Australasian Landscape Services Holdco Pty Ltd, which is 100% owner of the entities listed in section 2.2 below, along with the New Zealand entity Recreational Landscape Services Limited and its controlled entities.

The ALS Board

The ALS Board of Directors (the "Board") consists of 8 Members.

The Board's role is to oversee the management of the Group and provide strategic guidance. A Board Constitution formally set out the Board's functions and responsibilities, with the objective of the Board being able to perform its role more effectively. This creates a system of checks and balances to provide a balance of authority.

Green by Nature's Executive Team

The Executive Team consists of:

- Chief Executive Officer
- Chief Financial Officer
- Chief Commercial Officer
- Chief People Officer
- Director, Government, Commercial and Infrastructure
- Director, Sports, Community and Education, and
- Director, New Zealand

2.2 Operations

Green by Nature are providers of landscaping services for facilities, stadiums, parks, and open spaces. Green by Nature's services model is a dynamic system that meets Green by Nature's clients' ever-changing requirements, by providing specific, innovative, flexible, and cost-effective solutions. This is achieved by having specialised teams located throughout Australia and New Zealand.

Modern Slavery Statement

Australian Business Number and Address Details

Australasian Landscaping Services HoldCo Pty Ltd ABN 24 652 220 794

Registered Address: Level 18, 68 Pitt Street, Sydney NSW 2000

Australian Owned/Controlled Entities:

- Australasian Landscape Services Finco Pty Ltd, ABN 23 652 221 157
- Green Options Pty Ltd, ABN 59 002 456 797
- Green Options Commercial Pty Ltd, ABN 14 648 429 172
- Green Options Queensland Landscaping Pty Limited, ABN 23 640 242 440
- Green Options Residential NSW Pty Ltd, ABN 23 665 786 783
- Green Options Maintenance NSW Pty Ltd, ABN 21 640 242 431
- Green Options Landscape NSW Pty Ltd, ABN 13 640 242 459
- Green Options Golf/Renovation NSW Pty Ltd, ABN 15 640 242 468
- Green Options Racing Pty Ltd, ABN 32 608 616 548
- Professional Landscape Management Pty Ltd, ABN 86 109 701 297
- Professional Landscape Equipment Pty Ltd, ABN 32 161 103 153
- Skyline Landscape Services Pty Ltd, ABN 82 073 170 279
- Skyline Landscape Services (QLD) Pty Ltd, ABN 15 114 488 041
- Skyline Landscape Services (VIC) Pty Ltd, ABN 62 146 508 858
- Skyline Landscape Services Group Pty Ltd, ABN 36 134 440 476
- Skyline Tree Care Pty Ltd, ABN 99 607 265 305
- Skyline Landscape Management Pty Ltd, ABN 21 137 610 765
- Super Gardens Pty Ltd, ABN 12 007 352 114

Countries of Operation

Australia and New Zealand

Stakeholders

Green by Nature stakeholders include, but are not limited to:

- Our client community
- Federal, Local, State and Territory Governments and their agencies
- Our providers and partners
- Our investors
- Our employees and partners
- Our associates
- The Australian and New Zealand community

Employees and Representatives

Total Number of Employees in Australia as at 30 June 2023: 1,267

The proportion of females employed is at 16%.

People Metrics

Modern Slavery Statement

Business	Permanent FT	Permanent PT	Fixed Term FT	Fixed Term PT	Casual	TOTAL
Green Options / Super Gardens	632	12	1	0	87	732
Skyline	391	12	0	0	132	535
Green by Nature Total – Australia	1,023	24	1	0	219	1,267

By State / Territory (AUS)	NSW	VIC	QLD	WA	ACT	SA	NT
No. of Employees	516	323	297	77	35	17	2

2.3 Supply Chains

Green by Nature's partner supply chains are within a range of suppliers who provide services or products which are essential to provide our specialised services to our customers/clients. All of Green by Nature's partner suppliers are required to comply with any laws, statutes, regulations, bylaws, ordinances, or subordinate legislation. All safety, legal and other legislative requirements applicable to the supply chain partner's workplace are identified by consulting with them. Pertinent information is retained in the supply chain partner's file for future reference.

Green by Nature's major suppliers provide services or products that provide long term and stable supply to enable Green by Nature to achieve its objectives. Green by Nature's major suppliers are based in Australia and New Zealand.

3. Describing the risks of modern slavery practices in Green by Nature operations and supply chains

Green by Nature stands as a prominent provider of landscaping solutions, offering a diverse range of environmentally conscious design, installation, and maintenance services to both residential and commercial clients across Australia and New Zealand. Our supply chain encompasses a network of suppliers, contractors, and partners who all play pivotal roles in our operations. We actively seek out partners who share our values and who prioritise ethical business practices.

Green by Nature have an established risk management practice which is calibrated to modern slavery provision auditing. It is unlikely that the currently known supply chain has risks that meet the threshold for serious exploitation as defined by the Modern Slavery Act 2018. Consequently, the risk is assessed as low. Nonetheless, Green by Nature understands that:

- There is a possibility that presently assessed contracts and supply chains may develop links to modern slavery further down the supply chain where they are outside of the Group's visibility and control.
- The Group also understands that our visibility of practices in our complete downstream supply chain may be limited in sourcing some goods.

Modern Slavery Statement

- We also acknowledge that modern slavery risks may alter over time, requiring us to be attuned to broader developments.

4. Describing the actions taken by Green by Nature to assess and address these risks, including due diligence and remediation processes.

Green by Nature maintain an uncompromising stance against modern slavery, human trafficking, forced labour, and child Labour. Our employees and partners receive thorough training to equip them with the skills necessary to identify and address instances of modern slavery and human trafficking. This empowers them to take immediate action should any concerns arise.

Green by Nature is committed to limiting the risk of modern slavery occurring within our business, infiltrating our supply chains or through any other business relationships. We are committed to the principles of the Modern Slavery Act 2018. This statement applies to all persons working for or on behalf of the Group and related entities, in any capacity, including employees, directors, agency workers, contractors, consultants, suppliers of services or products, and any other third-party representatives.

Our employees are bound by a robust code of conduct that unequivocally prohibits any engagement in or support of modern slavery or human trafficking. We nurture a culture of transparency and accountability. Our Code of Conduct outlines clear expectations for our suppliers, demanding strict adherence to rigorous ethical standards that categorically forbid any involvement in modern slavery, human trafficking, forced labour, or child Labour. We undertake meticulous due diligence when selecting and engaging with suppliers. This meticulous process involves a comprehensive assessment of their dedication to ethical practices and a meticulous examination of their compliance with all pertinent labour laws and regulations.

Green by Nature's policies and procedures are an essential part of the way the Group identifies and addresses modern slavery risks and helps to ensure practices are compliant with legislative obligations. They ensure that we act ethically and with integrity and observe human rights in all our business relationships.

Supporting our position on Human Rights, we have several policies and procedures to assist in mitigating human rights in our business and supply chain. Green by Nature expects all who have, or seek to have, a business relationship with the Group to familiarise themselves with this policy and to act in a way that is consistent with its values. The Group will only do business with organisations who fully comply with this policy, or those who are taking verifiable steps towards compliance.

Our comprehensive policies and training underscore our firm commitment to safeguarding human rights and promoting equitable and ethical working conditions.

These policies include:

- Modern Slavery Policy
- Code of Conduct Policy
- Ethical Sourcing & Sustainable Procurement Policy
- Corporate Social Responsibility Policy
- Whistleblower Policy

Modern Slavery Statement

- Grievance & Dispute Policy
- Workplace Behaviour Policy
- Young and Vulnerable Workers Policy
- Recruitment and Equal Opportunity Policy

If at any time Green by Nature becomes aware of Modern Slavery practices in our operations, suppliers, and supply chains used in the performance of contracts, we ensure that our operations, suppliers, and the supply chains must as soon as reasonably practicably take action to address or remove these practices, including where applicable by addressing any practices of other entities in its supply chains.

Green by Nature conducts the following to identify and control risks:

- Scope and determine the Group's structure, businesses and supply chains utilising the existing risk assessment methodology
- Formulate policies and procedures concerning modern slavery, including but not limited to collating current policies, identifying gaps, adapting existing policies, and formulating new policies as required
- Systemic risk assessment – highlighting business operations and supply chains where there is a risk of modern slavery taking place
- Assessing and managing identified risks – i.e., carrying out further due diligence in group operations and supply chains and reviewing and adapting contract terms and codes of conduct with suppliers
- Establishing processes and KPIs to monitor the effectiveness of the steps taken to ensure that modern slavery is not taking place in the business or supply chains
- Implementing remedial steps where modern slavery is identified
- Operating a comprehensive training and awareness program
- Gaining applicable third-party certifications and audits

Employees, Labour Hire, and Contract Labour

The majority of employees are employed directly under permanent or casual contracts under Green by Nature. These arrangements help us to reduce the likelihood of modern slavery across our operations. Employment contracts meet or exceed applicable employment legislative standards. At times it is necessary to use the services of labour hire agencies and Green by Nature only works with reputable organisations to provide these services.

Training

Training is key to ensuring Green by Nature employees are aware of standards and policies, can identify and assess risks, and are equipped to respond. Green by Nature will provide communications and training opportunities to all employees with procurement & supplier management responsibilities, to enhance their understanding of the causes and humanitarian impact of modern slavery, the Modern Slavery Policy, and our approach to limiting the risk of modern slavery within our supply chains and operations.

Modern Slavery Statement

Identifying Our Risks

Green by Nature takes a human-rights approach to risks, considering particularly the risks to people first and foremost. We perform due diligence to assess tier 1 suppliers and those deemed a higher risk to identify and address potential risks and strive for continual improvement. An assessment has been undertaken of the potential risks of modern slavery practices across our operations and supply chains and identified and categorised potential risks of exposure:

Low Risk:

- Raw materials & equipment supplier
- Labour Hire Agencies
- IT suppliers

High Risk:

- Uniform & PPE suppliers
- Subcontractors

Risk management is considered during initial engagement/onboarding of new suppliers and during reviews. Risk assessments initially address modern slavery risks of tier 1 suppliers but widens to include any supplier who is deemed a higher risk.

Actions

Through the collective efforts of key staff within the Group, including Directors, Executives, Senior Managers, Finance and Human Resources, the following actions have been determined to minimise our risks:

- Policies and procedures to include our proactive measures implemented to mitigate modern slavery risks
- Continue to adhere to and educate procurement staff on the Ethical Sourcing Policy
- Review our procedure for engaging subcontractors to ensure they follow best practice with regards to the Modern Slavery Act 2018
- Engage directly with new suppliers in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses
- Develop trusted, transparent relationships with suppliers
- Establish mechanisms for safe reporting of modern slavery risks
- Monitor high risk suppliers

Grievance Reporting

Grievance mechanisms can facilitate early detection of potential adverse impacts. Employees are free and safe to speak up when there are reasonable grounds to suspect that Green by Nature are not acting ethically or in accordance with laws and obligations. Mechanisms have been established for employees to express their concerns or disclosure in relation to modern slavery breaches. This allows for confidential and anonymous reporting and protection from reprisal. Clear processes for

Modern Slavery Statement

investigating and reporting issues raised are also established. Concerns about compliance, ethical issues, illegal activities are to be reported following the processes within the Whistleblower Policy.

Legislative Reporting

Green by Nature is required by legislation to provide an annual Modern Slavery Statement to the relevant Government body and we will align our practices to the requirements of the Commonwealth Act. We will also work closely with suppliers in their reporting requirements.

5. Describing how Green by Nature assesses the effectiveness of these actions

Assessing Effectiveness

We are responsible for the continuous improvement of our processes and actions taken to address modern slavery risks within all tiers of our supply chain, acknowledging this is an ongoing process. The ways in which we measure effectiveness include:

- Regularly reviewing our modern slavery approach and reporting to Senior Management on a periodic basis
- Regularly engaging with tier 1 and high-risk suppliers beyond initial assessment, to identify points of improvement within the process and track awareness levels
- Requesting and monitoring feedback after staff training sessions
- Monitoring frequency and trends of whistleblowing channels

Monitoring & Review

Monitoring of suppliers will be conducted through the audit and compliance program. Measuring of results will be through supplier non-conformances and reported grievances. Annual reviews of this policy associated policies, and risk assessments will be conducted and discussed during Management Review meetings.

Compliance

Green by Nature will also assess its effectiveness of meeting the risks of modern slavery practices in its operations and supply chains through strict compliance procurement and operational procedures, in line with legislation and procurement guidelines and policy. This is combined with formal certification by every Australian Business Unit in ISO 9001:2015 - Quality Management Systems. Green by Nature are also going through the process of gaining B-Corp certification.

Green by Nature achieving certification in ISO 9001:2015- Quality Management Systems and in the future successfully attaining B-Corp certification confirms that we have a comprehensive compliance structure, operating ethically as per our legislative responsibilities. This is supported by a system of policies, procedures, feedback channels, training, development, and monitoring of the system. This includes Modern Slavery, Human Rights and Ethics training and awareness being undertaken by all employees.

Being audited as part of ISO 9001:2015 - Quality Management Systems indicates that our Business Unit operating systems are sound and aligns with the legislative requirements. This global standard also

Modern Slavery Statement

indicates that we operate an organised and ethical people and procurement management system. In addition, once Green by Nature gain B-Corp certification it will also verify that we have a transparent mechanism for supporting ethical people and procurement management systems in place, with a range of existing methods being utilised to ensure that the supply chain operates within the company's expectations and as per wider expectations.

Awareness

A Training Register (otherwise known as a Skills Matrix or Training Matrix) is maintained to ensure training needs are recorded and continual improvement in personnel skill occurs. To ensure alignment and the identification of additional risks, pertaining to Modern Slavery. All employees have completed awareness training which is tracked via the Training Register. This training is aligned to the Australian Government Addressing Modern Slavery in Government Supply Chains toolkit. It focusses on:

- What modern slavery is
- What modern slavery looks like in supply chains
- What we can do to address modern slavery risks further
- How to report concerns about modern slavery practices

Other External Certifications:

Green by Natures' Australian Business Units (Skyline, Green Options, SuperGardens) have achieved additional external certification in:

- ISO 14001:2015 - Environmental Management Systems
- ISO 45001:2018 - Occupational Health and Safety Management Systems

Other Reporting Actions

Conduct Periodic reporting and reviews to the Board and executive. The group operates under a continuous improvement lens at every stage of its operating processes.

6. Describing the consultation process Green by Nature utilise with any entities it owns or controls

A description of how the reporting entity consulted on its Statement with any entities it owns or controls. Green by Nature has undertaken a risk-based approach to consultation with owned or controlled entities to prepare this Statement. Green by Nature launched targeted consultation enabled by our centralised quality system. The Group operates under a consolidated quality assurance and quality improvement framework. As the world's most useful quality management system standard, ISO 9001:2015 is our framework to continually consult, monitor and manage operations across the Group to achieve consistency and meet our obligations.

Consequently, extensive consultation and integration leading to this Statement were conducted through an effective and transparent system. This ensures that there is no deviation across the Group in any of its subordinate entities.

A Quality Management Team is dedicated to the integrated management system and maintenance of the system, which currently includes:

Modern Slavery Statement

- ISO 9001:2015 - Quality Management Systems
- ISO 14001:2015 - Environmental Management Systems
- ISO 45001:2018 - Occupational Health and Safety Management Systems

Green by Nature are also in the process of attaining B-Corp Certification.

7. Any other relevant information

Green by Nature remains steadfast in its unwavering commitment to eradicating modern slavery, human trafficking, forced labour, and child labour. By championing ethical conduct, transparency, and accountability, we aspire to contribute to a world where exploitation has no place. This statement encapsulates our ongoing endeavours to establish a responsible and sustainable business that upholds the dignity and rights of all individuals.

Our commitment to effectively combat modern slavery and human trafficking is demonstrated through our ongoing efforts to enhance our practices. We actively collaborate with industry peers and organisations to share and implement best practices.

Approved and Endorsed by the Board

Signed by:



Gino Sorrentino

Chief Financial Officer

Date: 1/12/2023