



**SECURECORP**

**Modern Slavery  
Statement**

CY22

## Statement from our Managing Director

This is Securecorp Pty Ltd (Securecorp)'s third Modern Slavery Statement covering the Australian Calendar Year from 1 January 2022 – 31st December 2022 (CY22) published in accordance with the *Modern Slavery Act 2018* (Cth) (the Act).

This CY22 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
- 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

On behalf of the Securecorp Group, I present this statement as a reflection of the efforts that our Risk and Compliance team, as well as the Securecorp Executive Team have undertaken to review and provide feedback on its content. The Statement has been approved by the Securecorp Board as defined by the *Modern Slavery Act (2018)* (Cth) before being signed by the Securecorp Managing Director on the 29<sup>th</sup> of June 2023.

Signed By:



**Harm (Harrie) Veerman**  
**Securecorp Managing Director**  
**29<sup>th</sup> June 2023**

## 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 7, 8 & 9
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 10 & 11
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 13
Requirement 5	Describe how the reporting entity assesses the effectiveness of these actions.	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**  
**29th June 2023**

## Addressing COVID-19 Impacts

Throughout 2022 some effects of the COVID-19 pandemic persisted while others slowly subsided. The residual ramifications continued to affect the local workforce through reduced availability to the skilled workforce as our Nation experienced a fourth wave of the pandemic. COVID-19 has continued to present significant challenges such as increases in demand for resources in some sectors and reductions across others.

Securecorp's ongoing commitment to the reduction in the reliance on subcontractors was again tested during CY22 which required the organisation to increase auditory review of the critical compliance obligations of its Suppliers.

Accordingly, Securecorp continued to implement the following 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.
- Employee Rapid Antigen Test (RAT) Reporting & Isolation Policy Requirements
- Training on COVID-19 and safe practices to mitigate the spread of the disease.
- Covid-19 Infrared heat detection scanning at head office entry point.

Throughout the development of the pandemic, Securecorp have continually improved the ways to partner with our clients and strengthened our consultative networks with employees and subcontractors.

Securecorp have reinforced its consultative infrastructure, methods of information sharing and upgraded its risk intelligence culture across the organisation to mitigate against the ongoing, evolving, and residual risks of COVID-19.

## About Securecorp

Securecorp are a leading national provider of electronics, security, monitoring, cleaning, and integrated services. We have grown since our inception as a Victorian-based security and risk management business in 1998, to a nationwide group of companies delivering the following range of professional services.

 <p><b>Security Manpower</b></p> <p>Securecorp provides security manpower services across a vast range of market sectors, including Retail, Commercial, Government, Events, Transport and Education</p>	 <p><b>Cleaning Services</b></p> <p>Provision of cleaning services to Aviation, Retail and Commercial sectors</p>	 <p><b>Electronic Security Installation and Maintenance Services</b></p> <p>Provision of electronic security Installation and maintenance services</p>	 <p><b>Alarm Monitoring &amp; Response Service</b></p> <p>Grade A1 Monitoring Centre that is ASIAL certified</p>
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Securecorp is highly cognisant of its growth since establishment in 1998 and the risks inherent with increasing globalization and the diversification of supply chains. Accordingly, we are committed to limiting the risk of Modern Slavery occurring within our business, infiltrating our supply chains, and throughout all other business 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 any other third-party representative. Securecorp require all who have or seek to have, a business relationship with our company, to familiarise themselves with our Anti-Slavery Policy (Policy) and to act in a way that is consistent with its values.

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

Securecorp require all colleagues to diligently manage our Modern Slavery risks and to remain vigilant of all Modern Slavery risks within the scope of Securecorp's business and business relationships.

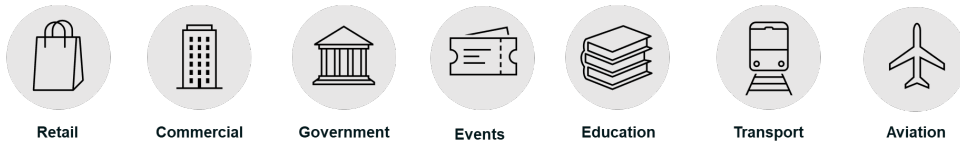
Securecorp is committed to being compliant with the requirements of the Act, including all reporting obligations.

## Securecorp's Structure, Operations & Supply Chains

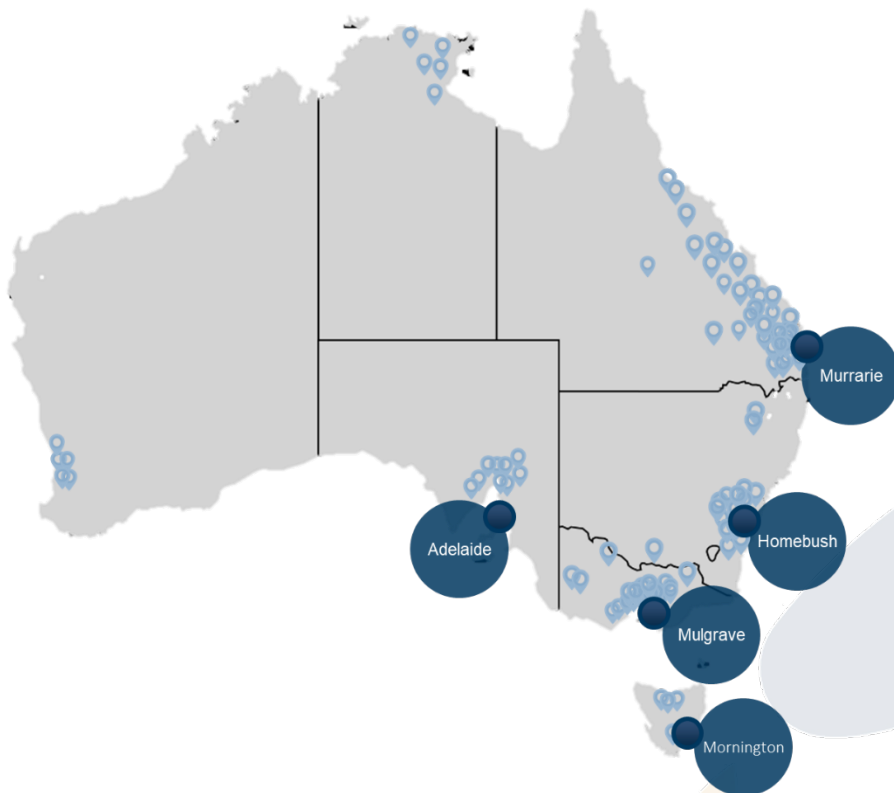
### Structure and Operations

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

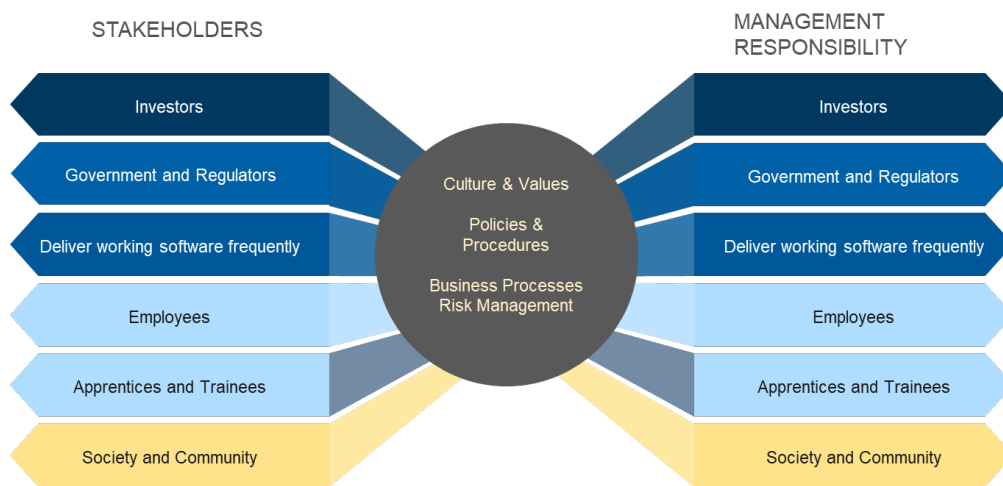


### Our Reach



Securecorp innovatively engages a collaborative approach to managing Modern Slavery. Our organisation ensures that all areas within the entities we own, or control are cognisant of the actions vital to effectively managing the Modern Slavery risks relative to their areas of operations. Securecorp engages in a consultative process that considers each entities relationship with the other and the risk profiles relative to that relationship.

Securecorp warrants that this process adequately ensures that the Modern Slavery risks relative to each entity we own, or control has been appropriately identified, assessed, and addressed, and that each entity is aware of the appropriate arrangements necessary to manage those risks. 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’s operations are administered by an experienced leadership team with Securecorp’s Managing Director overseeing the day-to-day operations of the company. Securecorp follows a documented process that delegates the authority required to ensure leadership responsibilities are effectively maintained across all areas of the business.

Top management engages with and is accountable to stakeholders on a day-to-day basis. Our stakeholders include Securecorp’s investors, Government bodies, regulators, employees, apprentices, trainees and more generally the wider community.

Encompassing Securecorp’s corporate governance structure are its policies and procedures, values, principles, and a highly intuitive risk intelligence culture.

## Supply Chain

Securecorp understands that its supply chain establishes the goods, services, and labour that contribute to the Company’s own services, including domestic and internationally sourced services.

Securecorp’s global supply chain consists 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.

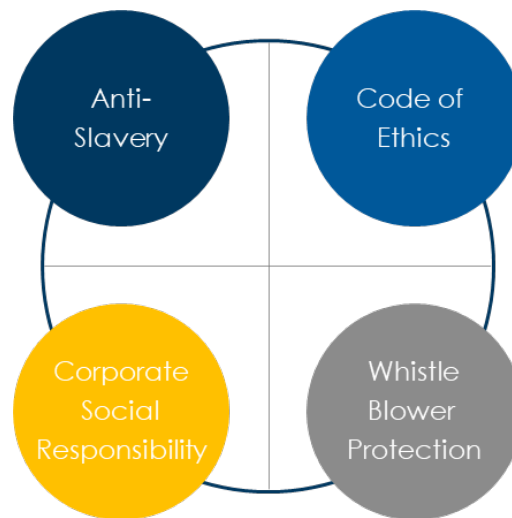


Securecorp is a proud Australian business that is committed to engaging Australian suppliers wherever possible for its Australian operations. Over ninety per cent of Securecorp's total procurement spend is within Australia, of which a considerable portion falls within the State of Victoria.

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

### **Policies and Procedures**

Securecorp is highly cognisant of the importance in protecting human rights and we are committed to protecting the rights of all people. Modern Slavery goes against the fundamental principles, and values that Securecorp upholds. Accordingly, Securecorp maintains the key policies and procedures that document the processes essential to our organisation assisting in the protection of human rights, including:



Additionally, Securecorp's Labour Supplier Management Procedure effectively communicates our expectations with the minimum standards we place on our suppliers. We undertake scheduled supplier compliance audits to ensure all suppliers comply with applicable legislation relative to ethical employment practices and the protection of human rights.

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

# Risk of Modern Slavery in Operations and Supply Chains

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

## Risk Identification Process



Securecorp undertake ongoing risk assessments to identify and prioritise Securecorp's effective management of Modern Slavery. Our supply chain is essentially labour based (>85%), including equipment, consumables, and uniforms, *inter alia*. Accordingly, Securecorp ascertain that diligent Labour Supply management is our priority.

Suppliers were assessed during CY22, using risk-based tools such as ongoing questionnaires as well as intelligence gathered through public sources, discussions with suppliers, comprehensive joint initiatives with clients, and ongoing industry affiliations.

During CY22, Securecorp continued our review and assessments of our suppliers and has not identified any instances of Modern Slavery.

During CY22, the delivery platform for Securecorp's Modern Slavery survey was upgraded. Our CY22 Questionnaire was sent to 200 select vendors using a risk-based approach across all entities.

## Modern Slavery Risks in Our Direct Workforce



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

The Modern Slavery risks relative to our direct workforce are assessed in the context of our corporate social responsibilities, policies and practices, ethical standards, behavioural conduct expectations and diligent minimum wage compliance audits. Securecorp maintain certified processes to comply with all legal and contractual obligations and to manage all workforce entitlements. Our organisation maintains an established Integrated Management System (IMS) that meets the expected industry, and regulatory requirements fundamental to providing the highest ethical standards of service delivery. Our IMS also supports a high-level delivery of health and safety engagement, reporting, and auditing that proactivity aligns with the strategic direction required for growth and commitment to our people and safety culture.

Our People and Culture team deliver comprehensive training to promote diversity and inclusion and workplaces which are free from discrimination, harassment, and bullying; support good health and well-being and sustainable work-life balance. Our teams are equipped with vital ethical compliance knowledge and provided ongoing consultation throughout their employment. Securecorp promote numerous channels to report any suspicious or unethical behaviour or conduct.

Our compliance programs and legal diligence collectively ensure Securecorp is a supportive, thriving workplace, that continually minimises 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 numerous ways, including by child labour, debt bondage, forced labour and human trafficking.

Securecorp acknowledges the following potential risks in its 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.

Securecorp considers the abovementioned third risk is potentially the most probable risk to eventuate (if any), in that Securecorp may be directly linked to Modern Slavery practices. Our organisation is highly alert to the potential risk that its operations and services may inadvertently be connected to Modern Slavery through the activities of another entity we have a business relationship with. This includes those suppliers who maintain most operations outside of Australia. These business relationships include all entities in the Securecorp supply chain and includes entities with which Securecorp does not have a contractual relationship with. 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, potentially inherit the highest risk of Modern Slavery in Securecorp's supply chain. Securecorp appreciates its most probable 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 often made in countries such as North Korea, India, and other countries identified as a high geographical risk.

Securecorp is committed to continually improving its relationships with other businesses, government agencies, and suppliers, 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 CY22, Securecorp undertook a comprehensive survey of 200 select vendors using a risk-based approach 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.

Our organisation works diligently with its stakeholders to identify and understand the impacts of its activities. Due diligence is undertaken to identify, assess, prevent, and mitigate adverse impacts arising from Securecorp's activities. Our due diligence involves 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.

Our Modern Slavery review process is initiated by risk identification, auditing, and assessment of all suppliers prior to any contracting. Securecorp has implemented a comprehensive risk management process to identify, monitor, assess and mitigate potential risk areas where Securecorp are most likely to be exposed to human rights concerns.

Findings from our risk assessments are reviewed and communicated across the organisation, and, where applicable, the Group, takes appropriate action to address potential impacts. Our preventative measures include vigilant governance, diligent contractual arrangements, auditing, effective grievance mechanisms, training and communications, joint initiatives with clients, and the use of statutory declarations. These measures are discussed in more detail below. As a medium to large Australian enterprise, Securecorp is fully cognisant that its ability to use its leverage to minimise Modern Slavery risks is limited particularly when engaging with large conglomerate organisations further down its supply chain.

Securecorp monitors, measures, and tracks its performance to consider whether impacts are being appropriately addressed in addition to conducting internal audits of its supplier screening processes.

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

## Governance



Securecorp consider that good governance is essential to the long-term sustainable success in eliminating Modern Slavery. Good corporate governance is paramount to the cultural values throughout our operations and is the collective responsibility of all levels of management and all employees. The risk of Modern Slavery in Securecorp's operations and supply chain is assessed within our corporate-wide governance and risk management framework. Responsibility for assessing and addressing Modern Slavery risks has been assigned to Top Management who are charged with briefing Securecorp's leadership team regularly and informatively.

## Contractual Arrangements



Securecorp ensures that suppliers and contractors comply with Securecorp policies through contractual arrangements, audits, and procurement principles. Securecorp's contractual terms and conditions require minimum standards in corporate social responsibility, ethical business practices, safety, and environmental protection are met.

## Grievance and Feedback



Securecorp promote numerous mechanisms for stakeholders, employees, and other third parties to anonymously report suspected or actual illegal activities, breaches of human rights, and/or company policies. Training in appropriate reporting channels features 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 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) or use the [online form to report information regarding human trafficking](#). Securecorp's grievance procedures ensure 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. We require all suppliers to sign a statutory declaration or equivalent requesting their commitment to identify risks and to protect their organisation and supply chain from Modern Slavery practices. Securecorp's intention to collaboratively combat Modern Slavery with our suppliers is explicitly addressed in supplier contracts, prequalification's, and all relevant documentation.

Our organisation is thoroughly prepared to respond to all suspected occurrences of Modern Slavery ensuing in 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 include:

- risk profile scheduled auditing of all contractors' wages, superannuation, and licenses
- gap analysis of Securecorp's policies and procedures against the Act
- investigating suppliers providing products/services purchased by the company such as corporate clothing, to determine any risks of Modern Slavery
- ongoing reviews of data collection from information received via Modern Slavery Supplier Surveys
- ethics, corporate social responsibility, grievance mechanisms, and modern slavery training and development for employees and subcontractors

## Assessing Effectiveness

Securecorp undertakes ongoing assessments into the effectiveness of its Modern Slavery management with consideration to industry standards and practices.

The following demonstrates the methods Securecorp undertakes 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. Timely investigation of reported or 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 of reporting channels and grievance mechanisms.



## Communication and Training

Securecorp engage a risk based collaborative approach to evaluating suppliers, contractors, and all entities within the Group. Our communication and consultation processes are scheduled from operational level through to Top Management.

In CY22 Securecorp transitioned its training platform and augmented its training curriculum. Securecorp's ethics, CSR, policy acknowledgment and Modern Slavery standards, *inter alia*, are implanted into our core induction training modules. Given these principles are fundamental to our core compliance obligations, it is also a requirement that each employee re-completes this training annually. Training matrix are used onsite to manage completion rates and recompletion dates.

Top Management ensure that all colleagues receive sufficient training and support relevant to the applicable scope of their responsibilities.



## LOOKING FORWARD

Further to our commitments in this Statement, Securecorp will continue undertaking the following Modern Slavery initiatives over the course of the 2023 Calendar year:

Securecorp will –

- Maintain scheduled executive reviews of its response to Modern Slavery.
- Continue to undertake ongoing scheduled 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 reporting channels and grievance mechanisms.
- Continue to conduct internal audits of our risk management processes.
- Continue providing informative and relevant 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 operational and supply chain Modern Slavery exposure. Securecorp have conducted comprehensive internal consultation with key stake holders across the leadership and management teams in producing this Statement.

### Ongoing Commitment

This Statement plays an integral part of our communication with internal and external stakeholders. It is vital to documenting our commitment to continue conducting ongoing human rights due diligence. Securecorp's approach to remaining vigilant and diligent 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 ethical business practices and social responsibilities.
- Assure all policies and procedures, including this Statement and our Anti-Slavery Policy remain current and relevant.
- Remain vigilant of all modern slavery risks within our operations.