



MODERN SLAVERY STATEMENT

MSS Group

Reporting Period FYE 31 March 2022

Date of Statement: 30 September 2022



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ABOUT THIS STATEMENT

This Modern Slavery Statement is made pursuant to section 16 of the Modern Slavery Act 2018 (Cth) ("the Act") jointly on behalf of SIS Australia Holdings Pty Ltd, ABN 65 132 211 459, and its below noted Australian subsidiaries (collectively, the "MSS Group"). It describes the actions taken by the "MSS Group" during the MSS Group 2021 to 2022 financial year ("2022 Reporting Period") to identify, mitigate and manage modern slavery risks in our business and supply chains. It is the third Modern Slavery Statement made by the MSS Group.

Operating Subsidiaries:

- MSS Security Pty Ltd, ABN 29 100 573 966 ("MSS Security")
- MSS Strategic Medical and Rescue Pty Ltd, ABN 48 155 387 152 ("MSS Strategic Medical and Rescue")

Joint Venture Subsidiary

- Habitat Security Pty Ltd, ABN 48 610 598 242 ("Habitat Security")

Other Subsidiaries:

- SIS Australia Group Pty Ltd, ABN 58 132 211 806
- SIS Group International Holdings Pty Ltd, ABN 89 600 112 490
- SIS MSS Security Holdings Pty Ltd, ABN 62 132 211 824
- MSS AJG Pty Ltd, ABN 50 610 598 251
- Australian Security Connections Pty Ltd, ABN 80 160 045 189

Note: Although related bodies corporate of the MSS Group entities, this statement does not cover Southern Cross Protection Pty Ltd, ABN 93 094 077 255 and its subsidiaries, Charter Security Protective Services Pty Ltd, ABN 91 133 958 406 and Askara Pty Ltd, ABN 56 082 632 540 (collectively the "SXP Group"). The SXP Group is supplying a separate statement.

OUR OPERATIONS

The MSS Group, which operates commercially through MSS Security, MSS Strategic Medical & Rescue and Habitat Security, is Australia's leading security and emergency response service company with a national infrastructure and offices in the capital cities of all states and territories.



MSS Security provides a full range of security services across key market segments. Our security officers provide a visible presence, using a broad range of skills, from general guarding to highly specialised roles. Our significant workforce in Australia underpins a national service delivery footprint and provides the foundation for a comprehensive offering, which includes:

- Static guarding
- Roving and mobile patrols
- Aviation & maritime screening
- Emergency surge requirements
- Alarm response
- Events management
- Control room operations
- Access control
- Concierge services
- VIP protection
- First aid & medical support
- Traffic management
- Investigations
- CCTV and alarm monitoring
- Customer service security training
- Risk analysis & business continuity planning
- Security assessment, policy development & implementation
- Emergency response, planning, simulation & exercises



MSS Strategic Medical and Rescue is the specialist paramedical, emergency response and rescue division of the MSS Group. We provide qualified and trained paramedics, emergency response and rescue personnel to the heavy industrial, mining and resources sectors.

MSS Strategic Medical and Rescue also supplies specialised clinical emergency response advisory, clinical governance and medical consultation services for our various site-based occupational first aid responders, and emergency response and rescue and occupational first aid training. Key services offered include:

- **Emergency health services** – credentialed multi-disciplinary Paramedics, Registered Nurses/OHNs and Industrial Medics who hold competencies in emergency response and/or ERT support;
- **Site-based primary care practice** – on-site occupational health and hygiene, drug and alcohol testing, return to work and health promotion services;
- **Emergency response, fire and technical rescue services** – multi-disciplinary Emergency Response Officers (ERT Teams), including specialist ESO (fire and rescue) team leaders; and
- **Clinical/first aid, emergency response, fire and technical rescue training** – nationally accredited and non-accredited on-site instruction, and first aid supplies, paramedic and fire rescue equipment and logistics.



Habitat Security is a joint venture between an Indigenous entity, DMAC Workforce Consultancy, ABN 86 656 926 822, an indigenous minority individual shareholder and SIS MSS Security Holdings Pty Ltd, ABN 86 656 926 822. The joint venture emerged from our commitment to the Australian Government's Employment Parity Initiative (EPI) which:

- aims to increase Indigenous employment in large companies to reflect the proportion of the Indigenous population nationally;
- was created in response to the Government's drive to open up opportunities for Indigenous-owned businesses as part of its Indigenous Procurement Policy; and
- supports the Government's commitment to real skills, sustainable employment, and economic growth to ensure prosperity for Indigenous Australians.

Operationally based in the ACT, Habitat Security specialises in providing security guarding and associated services, particularly to government departments and agencies.

OUR SUPPLY CHAIN

The MSS Group spent approximately \$241 million on supplies across 1060 Tier 1 or direct suppliers¹ in the 2022 Reporting Period. A broad range of goods and services were procured, however, given that our operating business is labour based, as was the case in prior years, our labour provider security subcontractors comprised by far the largest group of Tier 1 suppliers in terms of spend.

The below table sets out the dollar spend and percentage of total supply costs with respect to our security subcontracting activities and demonstrates a significant increase in dollar spend on such activities in the 2022 Reporting Period relative to the prior 2021 and 2020 Reporting Periods.

Reporting Period	Total Supply Costs	Dollar Spend on Security Subcontracting	Percentage of Supply Costs on Security Subcontracting
2020	\$ 150 million	\$ 117 million	78%
2021	\$ 185 million	\$ 152 million	82.2%
2022	\$ 241 million	\$ 188.4 million	78.2%

In the ordinary course of business, we also manage a relatively narrow and limited supply chain of other products and services to support our staff and service delivery. Such other products and services include uniforms, IT and communications, fleet, security and medical equipment, personal protective equipment (PPE), consumables, travel and accommodation, cleaning, property leasing, insurance and professional services.

While the vast majority of our Tier 1 suppliers are Australian companies or individuals, we are aware that a small minority - particularly of our larger uniform, IT, fleet and medical equipment and PPE suppliers - source products from Asia and other parts of the world. The MSS Group has developed long-term productive business relationships with many of our larger suppliers and has, in most cases, documented the terms of these relationships, including our expectations in relation to modern slavery, in formal agreements.

At the other end of the spectrum of our Tier 1 suppliers are very small spend individual vendors who provide a one-off product or service for a spend of \$1,000 or less. Approximately 380 (or 36%) of our Tier 1 suppliers in the 2022 Reporting Period were such vendors. Given that our employee reimbursement process is completed via our accounts payable system (requiring those staff who seek reimbursement for various costs to be set up as vendors) a significant proportion of these small spend vendors were actually our employees making expense claims for such things as consumables, parking, cab fares or training services. Such vendors present negligible risk with respect to modern slavery.

ASSESSING MODERN SLAVERY RISKS

To reduce the risk of modern slavery practices in our supply chain, in 2019 the MSS Group established a "Working Group" representing all operating entities in the MSS Group and consisting of representatives from legal, commercial, procurement, HR, IT and other relevant areas of our business. Amongst other responsibilities, the Working Group is responsible for undertaking due diligence and developing and maintaining a constructive strategy and action plan with respect to the identification, management and mitigation of modern slavery risks.

At the beginning of the 2020 Reporting Period, members of the Working Group commenced an initial high-level risk analysis of our Tier 1 suppliers and our own operations to assess modern slavery risks. In the 2021 Reporting Period, the Working Group completed this Tier 1 review and has since been reviewing selected Tier 2 Suppliers.

¹ This excludes inter group subcontracting – for example, where MSS Strategic Medical and Rescue supply services to MSS Security.

The risk analyses undertaken in the 2020, 2021 and 2022 Reporting Periods have taken relevant factors into account including:

- information from recognised labour and human rights groups and resources including the *Global Slavery Index*²;
- the presence of vulnerable groups in the supply chain, for example, low-skilled personnel and migrants or non-English speaking workers³;
- sector and industry risks, for example informal and unregulated industries (such as the cleaning industry) are typically considered high risk⁴;
- product and services risks, as specified in the *Global Slavery Index*, for example garments (apparel and clothing accessories) and electronics (laptops, computers and mobile phones) are in the top 5 products at risk of modern slavery; and
- geographical risks as indicated by the *Global Slavery Index*.

Based on these considerations, the Working Group made the below conclusions:

- our primary industry, the security industry is one with potential risks of modern slavery practices. One reason for this is that some work performed by security officers is low-skilled and more accessible to vulnerable populations;
- absent suitable safeguards, unscrupulous businesses (including those operating in Australia) may be tempted to exploit vulnerable workers; and
- whilst the MSS Group itself has numerous and strong safeguards to mitigate against the potential risks of modern slavery within its own operations, such safeguards may not be present with respect to our supply chain and thus may need attention.

Given the above conclusions and the significant increase in security subcontracting in terms of actual spend in the 2022 Reporting Period⁵, the Working Group's recommendation to continue to focus supply chain attention on actions to mitigate risks with respect to security subcontractor suppliers, was followed.

ADDRESSING RISKS - OUR DIRECT OPERATIONS

The MSS Group has a zero-tolerance approach to and rejects any form of modern slavery. We are committed to assessing and addressing modern slavery risks and to implementing and enforcing reasonable, practical and effective systems and controls to minimise the possibility of modern slavery taking place anywhere in our own business or our supply chains.

The material modern slavery risks present in our own operations are different to those in our supply chain. Our employees are directly employed pursuant to applicable Australian laws such as the *Fair Work Act 2009* (Cth) and the applicable industrial award or enterprise agreement. Amongst other things, these laws, awards and agreements place responsibility on us, as employer, to ensure our employees are treated fairly and receive the minimum employment rights and entitlements including such things as minimum pay, leave entitlements, periods of notice and redundancy.

In addition, as employer, we are also required to ensure employees are accorded protections of relevant rights, including the right:

- to be free from undue influence or pressure in negotiating individual agreements;
- to be protected from unlawful actions such as adverse action, coercion, misrepresentation and undue influence in relation to such things as individual flexibility arrangements under modern awards or enterprise agreements

² Global Slavery Index 2018 <https://www.globallslaveryindex.org/2018/findings/highlights/>

³ See, for example the Australian Council for Superannuation Investors Modern Slavery Risks, Rights and Responsibilities: A Guide for Companies and Investors (survey conducted by KPMG) <https://assets.kpmg/content/dam/kpmg/au/pdf/2019/modern-slavery-guide-for-companies-investors-feb-2019.pdf>

⁴ See Australian Border Force *Addressing Modern Slavery in Government Supply Chains – A Toolkit of Resources for Government Procurement Officers* available at <https://modernslaveryregister.gov.au/resources/>

⁵ As illustrated in the table on page 5, there was an increased \$36 million spent on security subcontractors in the 2022 Reporting Period, relative to 2021 Reporting Period

- or to unlawful deductions from wages;
- to be free from unlawful discrimination; and
- to membership of a trade union and to engage in industrial activities.

Being directly employed also means that we have direct control of the contractual and other arrangements with our employees, including the recruitment and onboarding process, training, safety, well-being and related programs.

We take the responsibilities we have to our employees seriously. Through our dedicated human resources and industrial relations team, we are committed to ensuring we meet the above and all other workplace related obligations. This is accomplished through such things as the recruitment of specialised and suitably qualified personnel into the team, regular reviews and audits of our contracts and other documentation, systems, policies and processes to ensure they are appropriate and up to date, periodic employee surveys, the encouragement of the reporting of concerns through our grievance and other mechanisms and promptly responding to and remedying any inadvertent errors that may be identified.

Further safeguards with respect to our direct operations include those set out below.

Commitment to Corporate Social Responsibility

Corporate social responsibility is integrated into our operations. We conduct our business with high ethical standards to meet financial, community and environmental responsibilities. Above all else, our service delivery is conducted in the interests of people safety, economic use of resources, environmental sustainability, and compliance with laws such as modern slavery laws. We accept that our actions must accord with the interests of people and society. We have further reinforced our commitment to this important responsibility through the recent expansion and elevation of a key management role to that of Executive General Manager, People, Culture and Corporate Social Responsibility.

Employee Code of Conduct

Our Employee Code of Conduct expresses a comprehensive statement of expectations covering standards, behaviour, and governance. It is an expression of fundamental values and represents the framework for decision-making for every employee.

The Code establishes the following ethical business practices:

- we will comply with the law;
- we will act in good faith;
- we will consider the impact of our decisions on our stakeholders (members, employees, customers, governments, and the broad community) and seek fair resolutions;
- we will communicate openly and effectively with our stakeholders; and
- we will seek always to build trust, show respect, and perform with integrity.

We implement the Code of Conduct through policies, procedures and processes which are used throughout our operations. Our integrity, reputation and profitability ultimately depend upon the individual actions of our directors, officers, employees, and representatives. Each is personally responsible and accountable for compliance; and we monitor compliance with our Code of Conduct and promptly act on any breaches.

Policies, Procedures and Processes

Effective governance practices are embedded throughout our organisation via a comprehensive suite of policies and procedures which sustain corporate social responsibility. Mechanisms that are relevant for the purposes of identifying and minimising the risks of modern slavery include the following:

Modern Slavery Policy

Our Modern Slavery Policy, which was developed in the 2020 Reporting Period and implemented during the 2021 Reporting Period:

- provides awareness of what modern slavery encompasses;
- encourages individuals to be on the lookout for and report suspected acts of modern slavery;
- details the responsibilities of all stakeholders including directors, managers, employees and subcontractors;

- explains how concerns may be raised and how they will be dealt with; and
- sets out the consequences of non-compliance.

Whistleblower Policy and Procedure and Other Disclosure Schemes

Under our Whistleblower Policy, which was implemented in December 2019 and updated in April 2021, "Eligible Disclosers" who have reasonable grounds to suspect any misconduct or improper state of affairs or circumstances, are encouraged to report their concerns without fear of retaliation.

Eligible Disclosers include past and present employees, officers, associates, contractors or suppliers and their respective family members. Their concerns may include suspicions with respect to certain modern slavery practices.

Concerns may be raised with a number of identified personnel or bodies and may also be made through a confidential hotline managed by a third party; this helps to protect the anonymity of whistleblowers and also protects data privacy.

There have been no modern slavery issues disclosed or reported since the policy was introduced.

As a supplier of security services to the Commonwealth and to all State and Territory Governments in Australia, we also comply with and promote public interest disclosure schemes. These schemes were implemented by the Commonwealth, State and Territory Governments to encourage and facilitate disclosures of wrongdoing in the public sector, support and protect those who make disclosures, ensure disclosures are properly investigated and promote integrity and accountability.

Other Policies, Procedures and Processes

Other relevant policies and protocols have been reviewed to ensure they are aligned on modern slavery and human rights including our:

- Anti-Fraud and Corruption Policy;
- Child Safe Environment Policy;
- EEO, Discrimination, Harassment and Bullying Policy;
- Fatigue Management Policy;
- Grievance Policy;
- Recruitment Policy; and
- Work Health and Safety Policy.

Adherence to the Voluntary Principles on Security and Human Rights

Established in 2000, the *Voluntary Principles on Security and Human Rights* ("Voluntary Principles") are a set of principles designed to guide companies in maintaining the safety and security of their operations within a framework that encourages respect for human rights. Whilst not holding a formal subscription, the MSS Group adheres to the Voluntary Principles. To this end, to ensure that we comply with human rights ethics set out in the Voluntary Principles, we seek to:

- communicate effectively with our personnel;
- maintain high levels of technical and professional proficiency;
- act in a lawful manner and exercise restraint and caution;
- have, and observe, policies and procedures regarding appropriate conduct;
- record all allegations of human rights abuses; and
- conduct proper investigations, and report accordingly.

Training

Our ability to understand and respond to modern slavery and other human rights issues depends on the identification and reporting of relevant concerns. It is thus imperative that employees, suppliers, subcontractors, and other relevant stakeholders develop an understanding of what modern slavery issues are, how to report them and how we will deal with them. To this end, sections on modern slavery were developed for incorporation into our compulsory e-learning induction training for direct employees in the 2020 Reporting Period and this training was rolled out in 2021. All our employees are required to complete this training at the commencement of their employment and to also undertake refresher training every year. Employees also receive training with respect to our whistleblower scheme and relevant personnel are trained in the public sector public interest disclosure regimes.

ADDRESSING RISKS - OUR SUPPLY CHAIN

The MSS Group considers that, given the possible absence of suitable safeguards, some of those in our supply chain may be at a greater risk of modern slavery practices than our direct employees and that this may apply particularly with respect to our security subcontractor suppliers. Our key focus in the 2022 Reporting Period, as it was in the 2021 and 2020 Reporting Periods, was thus on the implementation of actions to mitigate risks with respect to security subcontractor suppliers - as recommended by the Working Group.

Addressing Risks with Key Suppliers - Security Subcontractors

Actions taken to address risks with respect to our Security Subcontractors in 2020, 2021 and 2022 include those below.

National Subcontractor Management Program

Historically, the model used by the MSS Group to manage and mitigate risks with respect to security subcontractors had been a state or territory-based model and there was no real consistency of approach across the business units. In the 2020 Reporting Period, the Working Group identified a need to develop and implement a comprehensive unified national approach.

During the 2021 Reporting Period, a suitable on-line platform was identified and a framework for a national approach for the management of subcontractor authorisation, due diligence, contracting, governance, compliance, auditing, training and record keeping, developed. An initial version of this was trialled in New South Wales that year. In 2022 this was revised and significantly improved and is currently being rolled out.

Authorised Subcontractors Only

Any entity that wishes to provide security subcontracting services to us is now required to be formally approved to become an "authorised subcontractor". To obtain authorisation status, the entity must satisfactorily complete our approval process to help ensure, amongst other things that: they run their business through a suitable and legitimate operating entity; they are financially sound; they are capable of providing the required services; they have all necessary licences, permits and insurances; they are able to satisfy our operational and training requirements; and they comply with the law, including the law in relation to modern slavery and the employment of their employees.

To retain authorisation, each year they are required to demonstrate that they continue to satisfy the above and must undergo an annual audit to confirm they have operated their business in accordance with their contractual obligations and the law.

Due Diligence and Vetting

During the 2020 and 2021 Reporting Periods, our state and territory businesses updated their security subcontractor due diligence and supplier vetting programs. This was improved further in 2022 with the implementation of our online national subcontractor management program.

Prior to authorising and engaging any subcontractor, the vetting undertaken nationally is a rigorous and multi-stage one that covers:

- a compliance check - in terms of ensuring that the subcontractor is a legitimate operating entity, is a member of a security industry association, has correct and up to date licences, and that their employees have suitable qualifications and licences and the right to work in Australia;
- a review of the subcontractor's financial health;
- confirmation that the subcontractor has appropriate, valid and up to date insurances;
- a review of the subcontractor's history and background, policies and operational processes;
- in appropriate cases, a review of the industrial instrument (enterprise agreement and/or contract of employment) used by the subcontractor with respect to the employment of its employees);
- a visit to the subcontractor's base to ensure the suitability of the premises; and
- an interview to discuss our requirements and expectations and the subcontractor's ability to satisfy these.

Subcontract

In September 2019 we implemented a new standard subcontract which contained specific provisions regarding

modern slavery, places a strong focus on obligations under industrial and work health and safety laws, and guards against potentially problematic practices such as sham contracting. During the 2021 and 2022 Reporting Periods, this standard agreement was amended to include more specific modern slavery expectations. The updated agreement is gradually being implemented.

Policies, Procedures and Processes

Our security subcontractors are required to comply with our relevant policies and procedures, in particular, our Modern Slavery Policy, our Whistleblower Policy and Procedure and our Work Health and Safety Policy. This requirement was formally included in updated security subcontract precedents in 2021 and again in 2022. We also recommend that security subcontractors develop and implement their own policies and procedures.

Training

Our subcontractor training program requires all employees of our security subcontractors to undertake an e-learning induction and to repeat this annually. The e-learning training outlines the rights and obligations of subcontractors and their employees and provides instruction on such things as our operational expectations and standards of conduct, work health and safety, EEO, discrimination, harassment and bullying and the MSS Employee Code of Conduct (which also applies to subcontractor employees). Modern slavery training has also now been incorporated into the subcontractor e-learning induction.

Regular Declarations

Our security subcontractors are required to provide periodic statutory declarations confirming (amongst other things) that: all their employees have been paid all amounts due to them under law (including all remuneration and superannuation due); the subcontractor has paid all workers compensation premiums; the subcontractor has conducted its business in a manner that is compliant with modern slavery laws; and has done all things reasonably required to reduce modern slavery risks in its operations and supply chains.

Regular Audits

Periodic audits are undertaken to ensure subcontractors act in accordance with their contractual obligations and the law. Before 2022, these audits were completed intermittently but will now be done on an annual basis.

Annual Subcontractor Questionnaire

Prospective security subcontractors who wish to gain authorised subcontractor status or authorised subcontractors who wish to maintain their authorisation status are required to complete an annual questionnaire. The key objective of this questionnaire is to confirm that the subcontractor has complied with modern slavery and other relevant laws such as labour hire laws, the *Fair Work Act 2009 (Cth)* and work health and safety laws and to obtain an overview of the status of such compliance. This questionnaire was implemented in 2019 but was updated to include more detailed and specific questions with respect to modern slavery. It is now issued online and is part of our national subcontractor management program.

ASIAL Subcontracting Code of Practice

During the 2021 Reporting Period, the Australian Security Industry Association (ASIAL) the peak body for security professionals, developed a Subcontracting Code of Practice. This Code, which took effect on 1 July 2021, aims to promote compliance with legislative requirements, eliminate sham contracting, protect vulnerable workers from exploitation and improve business practises.

The MSS Group embraced this initiative, was proactively involved in the drafting of this Code and is fully compliant with the provisions of the Code.

Addressing Risks with Key Suppliers – Other Suppliers

While our focus in the 2020, 2021 and 2022 Reporting Periods was on addressing risks with respect to our security subcontractors, some relevant actions were undertaken with respect to other suppliers, including the following:

Standard Contract Precedent Updates

Supply contract precedents are regularly updated to include specific clauses to mitigate modern slavery risks. These new precedents have been gradually introduced in our supply contracts as they have been renewed and or renegotiated.

Contract Management

We continued to work in collaboration with some of our major suppliers, particularly our key uniform suppliers, to incorporate measures safeguarding against modern slavery risks and monitor progress and implement plans to mitigate the risks identified.

Supplier Modern Slavery Questionnaire

A supplier questionnaire covering modern slavery and related issues was developed in the 2021 Reporting Period. In 2022 it was finalised and we are currently planning our implementation strategy. Suppliers that are assessed as high risk with respect to modern slavery will be required to complete this questionnaire. Answers and results of the questionnaires, together with other due diligence tools and discussions with the relevant suppliers will determine whether further investigation or action may be required.

Supplier Code of Conduct

A Supplier Code of Conduct, applicable to all MSS Group suppliers, their agents and subcontractors was finalised in 2022. This Code, which includes specific modern slavery related expectations is currently in the process of being implemented.

ADDRESSING RISKS - WORKING WITH OUR CLIENTS

In addition to our efforts with respect to addressing modern slavery risks in our direct operations and supply chains, we also work collaboratively with and support many of our clients in their own efforts to combat modern slavery. Some ways we do this include:

- answering client modern slavery related questionnaires and surveys;
- cooperating with such clients in relation to audits and reviews they undertake on our own compliance with modern slavery related matters;
- participating in client discussion groups and meetings on modern slavery, sustainability, ethical sourcing and related topics; and
- working to ensure that our training and other educational tools are appropriate and satisfactory for client specific requirements.

ADDRESSING EFFECTIVENESS

The MSS Group is committed to ensuring continuous improvement to check that our efforts to identify and tackle modern slavery risks are effective. While we are still developing our approach to measuring effectiveness, we currently monitor performance through a combination of the following:

- periodic review and revision of our modern slavery strategy and action plan by our Working Group;
- monitoring modern slavery training completion rates of our direct employees;
- monitoring modern slavery training completion rates of security subcontractor employees;
- seeking feedback with respect to our modern slavery training;
- monitoring the number of security subcontractors who implement their own modern slavery policy and awareness and training programs following our encouragement;
- annual auditing of security subcontractors;
- monitoring responses to our annual subcontractor questionnaire;

- investigating and analysing the complaints, grievances and reports of issues received with respect to modern slavery (including frequency and trends) via our whistleblower channels; and
- collaborating with and seeking feedback on our modern slavery approach and actions from key clients.

FUTURE PRIORITIES

In the 2023 Reporting Period and beyond, the MSS Group will continue to build on our achievements and take further action to manage and mitigate modern slavery risks in our business and supply chains. Moving forward, at a high level we will continue to:

- periodically review our modern slavery framework, strategy and action plan to ensure its effectiveness and currency;
- develop and improve our policies, procedures, training and processes;
- collaborate with our clients in their own efforts to combat modern slavery; and
- work to raise awareness of modern slavery issues with our employees, our security subcontractors and their employees and our other relevant suppliers.

More specifically, areas and actions we expect to focus on include the following:

Our Direct Operations

We intend to:

- obtain further feedback on our modern slavery training to determine whether a broader training and awareness program to help stakeholders understand and respond to modern slavery risks, is required;
- review and update relevant policies and procedures to ensure that they are current and sufficiently deal with modern slavery issues;
- continue to broadly promote our Modern Slavery Policy and our Whistleblower Policy and Procedure to remind personnel of their relevant rights and obligations and to encourage reporting through our third party managed hotline in the event they have modern slavery related concerns; and
- implement a new human resources information management system which we expect will, amongst many other things, assist with onboarding, optimise the HR and payroll support functions, assist with compliance and reporting requirements and thus assist in our management of modern slavery risks.

Our Supply Chain

Security Subcontractor Suppliers

We plan to implement additional action aimed at mitigating risks posed by our security subcontractor suppliers. In particular, we expect to focus on our annual security subcontractor auditing program to help ensure compliance with modern slavery, workplace and related laws and compare year to year results to check for developments/improvements.

Other Suppliers

Some expected future activities include:

- enhanced engagement and collaboration with key suppliers across high-risk categories to bolster our response to modern slavery and where necessary develop a joint approach to the management and mitigation of identified risks;
- where possible, further mapping of key high risk non-direct (Tier 2 and Tier 3) suppliers to help identify potential modern slavery risks and consider whether relevant actions may be required to minimise any risks detected;
- the assessment of supplier responses to the modern slavery questionnaire; and
- the review and improvement of procurement processes and the potential introduction of suitable procurement guidelines.

CONSULTATION

The MSS Group takes a collective approach to addressing the risks of modern slavery and compliance with modern slavery laws. Our operating entities undertake business in the security and related sectors, have many of the same suppliers, a common philosophy and share the same executive management team. Policies, procedures and processes of the MSS Group, including this statement, are developed collaboratively, and authorised by the directors of the respective entities.

APPROVAL

This statement was approved by the Board of SIS Australia Holdings Pty Ltd, ABN 65 132 211 459



Donald Burnett
Company Secretary