

# Modern Slavery Statement

2023



 **ARA**

Essential services for your  
facility and infrastructure

## Acknowledgement of Country

The ARA Group acknowledges the connection of people, land and communities within the areas that we work. We pay our respects to Elders past, present and emerging.

We seek to maintain meaningful partnerships by undertaking appropriate engagement practices within our business and for our communities. We acknowledge the importance of respecting and understanding the oldest living cultures in the world.

## About this statement

This Modern Slavery Statement (Statement) is made under the [Modern Slavery Act 2018 \(Cth\) \(MSA\)](#) and sets out the actions taken by the ARA Group to assess and address modern slavery risks in our operations and supply chains during the financial year ended 30 June 2023 (FY23).

This Statement is submitted by ARA Group Limited (ARA) for all our member bodies corporate deemed to be reporting entities under the **MSA**. This includes reporting entities which are wholly owned subsidiaries, as well as other entities which ARA has control of under the Australian Accounting Standards. A list of the reporting entities covered by this Statement is set out at Appendix 1.

The information set out in this Statement is provided as a consolidated description for ARA, except where information is identified as relevant to specific reporting entities within the Group. References to the 'ARA Group', 'Group' and the terms 'we' and 'our' are used in this Statement to refer collectively to ARA.

Prior to Board approval, this Statement was reviewed by the Group Chief Financial Officer, Group General Counsel, and the Group's Senior Management Team. Additional information about consultation with reporting entities and other owned and controlled entities is set out listed in Appendix 1.

This Statement was approved by the ARA Board (acting as a higher entity under section 14(2)(d)(ii) MSA) on 22 December 2023 and is signed by the Chief Executive Officer and Executive Chairman of the ARA Group, as a director of the ARA Board as required by the MSA.

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## Foreword by CEO & Executive Chair



ARA aspires to show leadership on serious social issues, by always doing business responsibly so that we protect our people and the communities and the environments in which we and our supply chains operate. Taking action to address modern slavery is a core element of this leadership, as is our absolute commitment to uphold human rights.

FY23 was another successful year for our operations and has allowed ARA to progress our initiatives to address modern slavery. Our ongoing commitment remains.

During FY24, our key priorities will continue to increase and enhance our assessment of modern slavery risks, our due diligence approach and our modern slavery training program.

ARA continue to hold itself to high standards in

everything we do and wishes to make available to others the information to evaluate our performance against those standards. Consistent with this, we look forward to continuing to build on our response to modern slavery, communicating our progress, and helping drive change within the infrastructure and facilities support and building services industries, to address meaningful, modern slavery risks.

I take pleasure in presenting this Statement, approved by the ARA Board of Directors on 22 December 2023.

**Edward Federman**

Executive Chair and Chief Executive Officer  
**ARA Group Limited**

22 December 2023

## Key actions in FY23

- Continuing review of our human rights risk triggers, weightings, and assessments to ensure they were reflective of increased vulnerabilities in supply chains and the changed risk profile as we emerge from the pandemic.
- Continuing assessment of human rights risk indicators in new and renewed supplier relationships.
- Ongoing strengthening of our management of modern slavery by continuing to embed bilateral modern slavery compliance clauses into our precedent contracts to require suppliers (including sub-contractors) to assess and address modern slavery risk in their operations and supply chains.



## Introduction

This is the ARA Group's fourth Statement under the MSA.

Our actions to assess and address modern slavery risks, supports our commitment to respect human rights, in line with the **United Nations Principles on Business and Human Rights (UNGPS)**.

This Statement sets out our approach and actions to manage modern slavery risks in our operations and supply chains throughout FY23. In this context, it also outlines our full emergence from the COVID-19 pandemic over its duration had negatively impacted many aspects of our business. This included our broader modern slavery program, which saw improvement initiatives slowed or delayed. With most, if not all, negative impacts of the COVID-19 pandemic on our business abated, we outline our future plans.

Modern slavery involves the most egregious violations of human rights and includes exploitation such as slavery, servitude, forced labour, forced marriage, child labour, debt bondage and human trafficking.

The ARA Group is absolutely committed to collaboration, consultation, and engagement with members of our supply chains, industry peers and all levels of government to share knowledge, to combat the increasing sophistication and complexity of modern slavery risk. Consistent with that pledge, the ARA Group will work to improve over time its processes and practices.

## How our FY23 statement builds on our FY22 statement

ARA is committed to the ongoing development and improvement of its modern slavery risk management and reporting under the MSA. We have taken a number of actions to strengthen our approach from the position outlined in FY22 Statement; including:

- Providing further detail on our operations and supply chain to explain our modern slavery risk profile;
- Expanding our description of modern slavery risks to better outline potential risks in our operations and supply chains;
- Outlining our assessment of the effectiveness of our actions; and
- Providing a detailed overview of our approach to consultation with our affiliated entities and controlled reporting entities.

# Structure, operations and supply chains

ARA Group Limited (the Group parent) is an Australasian based public unlisted company. ARA Group Limited has a range of subsidiary businesses that all, in one form or another, support the overall operations of the Group.

The Group primarily consists of four operating divisions, which work together as an integrated portfolio:

- ARA Electrical Services
- ARA Fire & Security Services
- ARA Products (incorporating ARA Manufacture)
- ARA Property Services (incorporating ARA Building Services and ARA Mechanical)

The Group's main business is the provision of a wide range of building service offerings to infrastructure and facilities managers and owners in the commercial, industrial, transportation and mining industries, and government. This involves a range of operational activities and functions, delivered both by in-house and contracted resources.

In addition to the core business of supporting the broad needs of building owners, the Group's broader portfolio of business operations include the manufacture of doors and the wholesale and direct supply of security products.

The Group also has a minority interest in an indigenous business (49% ownership) whose primary business activity is commercial cleaning.

The following table provides more information about our key operations and brands.

## Overview of the ARA Group



**Integration of and solutions for electronic security and fire protection**



### Fire Protection

- Inspection & Testing
- Sprinkler Systems
- Detection & EWIS Systems
- Passive & Fire Doors
- Portable Systems
- Special Hazards
- Fire suppression systems

### Electronic Security

- Access Control
- Intrusion Systems
- CCTV
- ATM Security
- Electronic Security Solutions
- Safes, Vaults & Teller Units
- Locksmith Services

### Marine Services

- Fire Fighting Systems & Equipment
- Hyperbaric/breathing Air Systems
- Pressure vessels, Relief Valves & Mechanical Equipment
- Ships Boats & davits
- Lifeboats & Davits
- Ship Repair & Underwater Services
- Marine Electrical & Automation



**Commercial cleaning, building services and building energy management.**



### Cleaning Services

- Commercial Cleaning
- Healthcare Cleaning
- Food Processing Cleaning
- Grounds Maintenance
- Waste Management & Recycling

### Building Services

- Remedial Building Repairs
- Insurance Building Repairs
- 24/7 Emergency Service
- Exterior & Interior Design
- Fit Outs of Interior Spaces
- Multi-trade Services
- Thermal Imaging
- Building Maintenance

### Mechanical Services

- HVAC Design
- Mechanical Ventilation
- Air Conditioning & Chiller Plants
- Building Automation
- Energy Management & Metering



**Electrical, high voltage, data and engineering**



### High Voltage Installation & Service

- Low Voltage Installation & Service
- Engineering Design & Solutions
- Manufacture of Switchboards & Switchrooms
- Structured Cabling



**Distribution and manufacturing**



### Manufacturing of

- Commercial Doors
- Industrial Doors
- High Security Doors
- Physical Security Systems
- Ballistic Glass
- Bollards, Gates & Commercial Bicycle Racks
- Joinery & Lockers
- Electronic Security Products**
- Access Control
- CCTV
- Photo ID Systems
- Identity Security
- Architectural Hardware



**Commercial cleaning services**



Operates as a commercial cleaning business and is a conduit for all ARA capabilities.

# Overview of our operations and brands

The following table provides more information about our key operations and brands.

<p><b>ARA Divisions</b></p>	<p>The ARA Group is comprised of four overarching Divisions, Fire &amp; Security, Property Services, Electrical and Products. Together our four Divisions form a 'one stop shop' of essential services for facilities and infrastructure.</p>	   
<p><b>ARA Feature Businesses</b></p>	<p>The ARA Group has several Feature Businesses that operate under their respective Divisions. An ARA Feature Business generally has a specific and unique offering and/or target demographic.</p>	         
<p><b>Other ARA Brands</b></p>	<p>The ARA Group manufactures and distributes a number of reliable products that are sold under various known brand names. The majority of these brands products have been created, from design through to installation, by ARA Manufacture.</p>	          
<p><b>Other ARA Businesses</b></p>	<p>Throughout the ARA Group there are a number of businesses that have been acquired and have continued to trade under their original business name. This is generally due to unique market requirements that deem it necessary to do so. Even though these businesses operated under a different name, they still represent the same business and ethical values that the ARA Group stands for.</p>	                

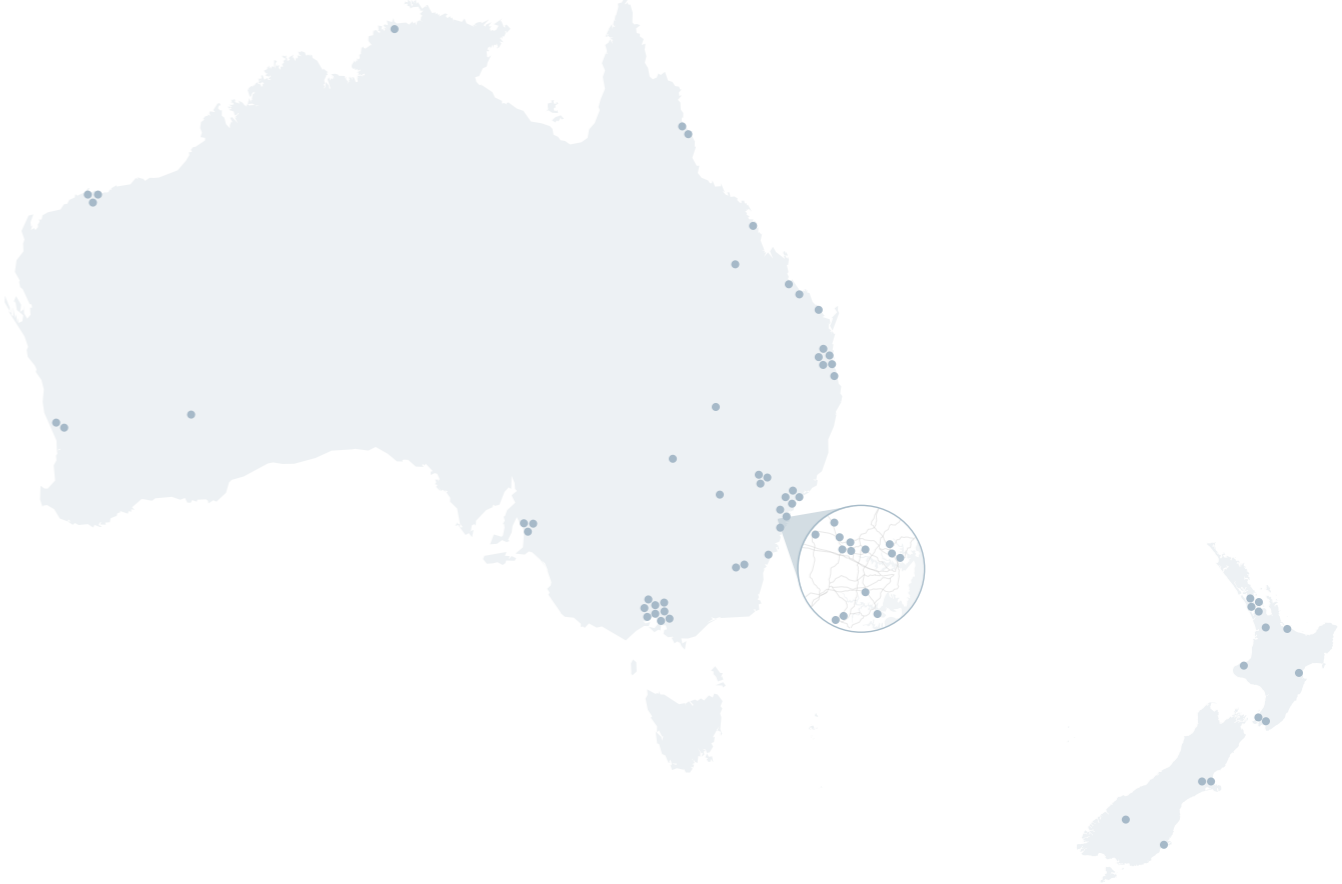
# Locations and People

The ARA Group is headquartered in Sydney with major operations throughout Australia and New Zealand together with a single manufacturing plant in mainland China. Our global workforce consists of over 2,900 employees across 3 countries, directly employed by a Group entity, either under an individual contract or under an enterprise agreement or modern award as required by the relevant national employment laws.

Within Australia, 80% of our employees hold operational roles such as technicians, tradesman, machine operators, testers, help desk operators, supervisors, and project managers. The remaining 20% of employees

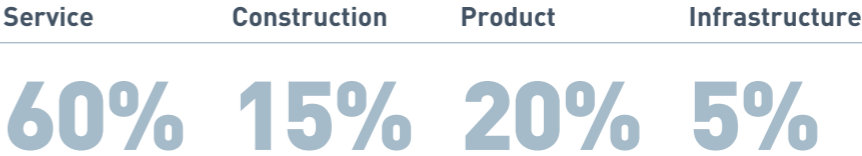
have office based managerial and administrative support roles such as finance and accounting, legal, information technology, safety and compliance, payroll and in people support.

Both our operations and support functions utilise indirect workers who deliver specialist services under contracts that the Group has with specialist providers. These indirect workers include contractors and labour hire resources that support our business in areas such as information technology, payroll, supplier, finance, and accounting.



# Our Customers

ARA provides a diverse range of goods and services to its customer base in Australia and New Zealand. With a primary focus on the provision of support services to building and facility owners in the commercial, industrial, mining and government sectors our client base is diverse.



# Supply Chain

ARA sources services, goods for resale and goods not for resale through a supply chain centred in Australia and New Zealand.

Procurement is undertaken on a divisional basis supported by a consistent organisational approach to modern slavery risk management with suppliers, with systematic strategic sourcing, supplier assessments, and onboarding processes. Once onboarded, the business unit that has engaged the supplier is responsible for oversight and governance, including management of identified modern slavery risks.

In FY23, we worked with just over 9,700 suppliers who provided goods and services across a range of categories to support our operations. Our spend across these suppliers remains highly concentrated, with 40% of our total spend during this period occurring with our top 100 suppliers and 70% of our spend with our top 500 suppliers. This concentration of spend with a smaller number of suppliers supports us to build strong, long-term relationships with key suppliers, which can assist us to better understand a range of risks associated with our supply chains.





# Risks of Modern Slavery Practices in Our Operations and Supply Chains

The building services support sector in which ARA operates is a highly competitive, complex, and rapidly evolving business environment, in which we undertake a diverse range of business activities. Despite this context, ARA endeavours to systematically identify potential modern slavery and broader human rights risk areas across our operations and supply chains.

ARA understands modern slavery risks have the potential for our business to cause, contribute or be directly linked to modern slavery. We also assess modern slavery risks as the broader risk to people, in addition to the risk to our business.

We recognise that the level of modern slavery risk in our operations and supply chains is influenced by a range of factors, including geographic, industry, sector,

and product specific factors, and we incorporate these considerations into our risk assessment processes. We also understand that our modern slavery risk profile is continually evolving, including due to impacts related to the COVID-19 pandemic. For example, we increased our spend on personal protective equipment, which can have high modern slavery risks due to the raw materials used, as well as potentially poor working conditions in overseas manufacturing facilities.

More broadly, the impacts of the COVID-19 pandemic increased the vulnerability of global supply chain workers to modern slavery and other forms of labour exploitation, which ARA acknowledges may also affect our exposure to modern slavery risks.



## What are Modern Slavery Risks?

### CAUSE

Businesses may be involved in modern slavery where their actions or omissions directly result in modern slavery occurring. For example, a group operating in the building services support sector could cause modern slavery if it intentionally subjected workers to serious exploitation, such as debt bondage or forced labour.

### CONTRIBUTE

Businesses may contribute to modern slavery where their actions or omissions significantly facilitate or incentivise modern slavery to the extent that the exploitation would have been unlikely to occur without them. For example, an entity may contribute to modern slavery by requiring offshore contractors providing services to it to reduce costs to a level that could only be sustained by using exploited workers.

### DIRECTLY LINKED

Businesses may be directly linked to modern slavery where their products, services or operations are directly linked to harm carried out by a third party, such as a supplier. For example, a security products distribution business may be directly linked to modern slavery though the procurement of electronic products manufactured by a supplier using materials produced using forced labour in those electronic security products.

The nature of a business' involvement in modern slavery or other human rights harm also determines the manner which that business is expected to respond, including in relation to remediation.

## Risks in our operations

ARA recognises that we may be directly linked to modern slavery should we not have in place appropriate controls to prevent this happening. The risk that we may be directly linked to, or without appropriate due diligence, contractual controls, and monitoring processes, or contribute to modern slavery involves our indirect workforce. While we have assessed the risk of modern slavery involving our direct employees as low, we recognise that contracted or contingent workers, including those provided by third party labour hire and in certain geographic locations, may be more vulnerable to modern slavery, including where these workers are lower-skilled and/or temporary or migrant workers. This may include workers in areas cleaning, some building and construction work and help desk call centre support.

## Risks related to our employees

Positively, ARA continues not to identify any modern slavery risks relating to our employees, as we consider our direct workforce to involve a negligible risk of modern slavery, which is effectively mitigated by our existing processes and controls. Our employees are directly engaged under contracts or enterprise agreements made under the laws of Australian, New Zealand or the relevant national employment legislation and are supported by a robust policy framework which aims to ensure a safe and fair working environment. In light of our understanding that broader labour exploitation may lay the foundations for modern slavery, we also recognise the rights of our employees to freedom of association with unions and collective bargaining, with or without third parties and the Group has established channels for engaging with respective unions. There are approximately 57 industrial instruments across the Group and representation from 16 unions.

## Risks related to our supply chain

There is the risk that ARA may be directly linked to modern slavery through our procurement of goods for resale. Approximately 25% of our total procurement spend relates to goods for resale, including products such as electronic security devices, electrical cable, fire panels, cleaning products obtained to satisfy customer orders. While we undertake due diligence of our suppliers, we recognise modern slavery risks in the supply chains of certain products can be challenging to identify and address.

There is the risk that ARA may be directly linked to modern slavery through our procurement of goods not for resale and related services. We procure a range of goods and services not for resale to support our operations, including IT equipment and services, manufacturing equipment, metal, wooden and other components, uniforms, and personal protective equipment. Across the ARA Group, we have assessed that various categories of imported goods and services such as information technology supplies and services, present a higher risk of modern slavery. These categories comprised 24% of our total procurement spend in FY23.



# Actions to assess and address identified modern slavery risks

ARA maintains a firm commitment to take all reasonable steps to assess and address modern slavery risks in our operations and supply chains. Importantly, we also integrate our response to modern slavery into our broader work to respect human rights.

Our actions to assess and address modern slavery risks in our operations and supply chains are based on four foundations:

- Policies
- Training and Awareness
- Risk Assessment and Due Diligence
- Collaboration and Stakeholder Engagement.

The following sections outline our governance framework and explain our work across each of these areas. In FY23 we continued to be unable to fully deliver our planned modern slavery continuous improvement initiatives. However, in recognition of the importance of managing potential risks of modern slavery, we continued to deliver our human rights risk assessment, due diligence, mitigation, and monitoring programs across our supply chains.



## 1 Policies

Across the group, we have established a comprehensive suite of internal policies to support our modern slavery response, including our;

- Code of Conduct
- Business Risk Management Policy
- Corporate Social Responsibility Policy
- Anti-Slavery Human Trafficking Policy
- Procurement Policy
- Subcontracting Policy

## 2 Training & Awareness

Training and awareness are key controls in addressing the risk of modern slavery. ARA has delivered direct tailored training and awareness sessions to employees in key roles and will work to formalise and expand this training across the group to build the capability of our employees to identify, manage and report potential modern slavery risks and red flags.

## 3 Risk Management & Due Diligence

ARA has a systematic and committed approach to identifying and eradicating modern slavery risk from our operations and supply chain. Our risk-based approach and due diligence processes operate to enable us to identify, prevent, mitigate, and account for how ARA addresses modern slavery risk in our supply chain. The key steps enable us to take a consistent approach to identifying, assessing, and managing risk:

- Identify • Assess • Mitigate • Communicate • Monitor

## 4 Collaboration & Stakeholder Engagement

Collaboration with our suppliers, our business partners, NGOs, and relevant government agencies to effect change is a key feature of the ARA strategy to combat modern slavery. Our stakeholder engagement and participation in industry forums provides opportunities for shared learnings and valuable insights to inform our response to modern slavery and broader human rights issues.

## 5 Monitor

ARA is committed to respecting human rights across our business and supply chain. Where we identify impacts that we may have caused, or to which we may have contributed or be directly linked we will seek to address this in line with government guidance and best practice.

ARA has reporting procedures and mechanisms where employees and third parties can report any concerns regarding unethical or illegal conduct, including in relation to modern slavery.

## Accountability and Governance

Our governance framework underpins our response to modern slavery, including by providing a clear structure for accountability.

ARA Group's CEO and Senior Management Team is responsible for the development and implementation of the Group's modern slavery program. This team provides subject matter expertise (SME) and guidance on modern slavery and broader human rights issues, including to embed appropriate actions, processes, and controls to address potential modern slavery risks, for example through the assessment of suppliers and third-party labour providers, as part of the supply chain assurance program.

Accountability for implementing actions to address modern slavery and other human rights risk is cross-functional across the different operating divisions of the Group. For example, where potential risks are identified, our General Counsel works with the business unit undertaking the sourcing activity to identify appropriate mitigation actions. The business unit is then responsible for managing the oversight and monitoring of the implementation of the actions, supporting any supplier contractual escalations.

Our management of modern slavery risks in our operations and supply chains falls within our broader approach to human rights risks and is assessed and managed consistently with our wider risk framework.

The ARA Board oversees the broader human rights program. In FY24 we will be seeking to continue our modern slavery forums such as our Modern Slavery Working Group, to further embed initiatives and provide increased oversight of modern slavery risk management in our operations and supply chains.

## Policies

The ARA Group has established a comprehensive suite of policies to support our modern slavery response.

Our policies clearly articulate the standards we expect from our people, our suppliers, and our business partners, including in relation to preventing and addressing modern slavery. The table below outlines our key policies relevant to modern slavery and how they are implemented across the Group.

We are committed to continually improving and refining these policies to ensure they remain fit for purpose. For example, during the reporting period, we revised our Code of Conduct and Anti-Slavery Human Trafficking Policy.

We also further strengthened our management of modern slavery risks during the reporting period by continuing to embed bilateral modern slavery compliance clauses into our precedent contracts, to require suppliers (including sub-contractors) to assess and address modern slavery risk in their operation and supply chains.



# Training

Training and awareness raising are key controls in addressing modern slavery risks.

## Training for our people

ARA has previously delivered tailored modern slavery training and awareness sessions to employees in key roles. We recognise the need to expand this training to develop the capability of our employees to identify, manage and report potential modern slavery risks.

Our human trafficking training was relaunched during FY22 and further developed during FY23 with the ongoing return to work of our people. This training focuses on building the awareness of key employees to identify indicators of human trafficking.

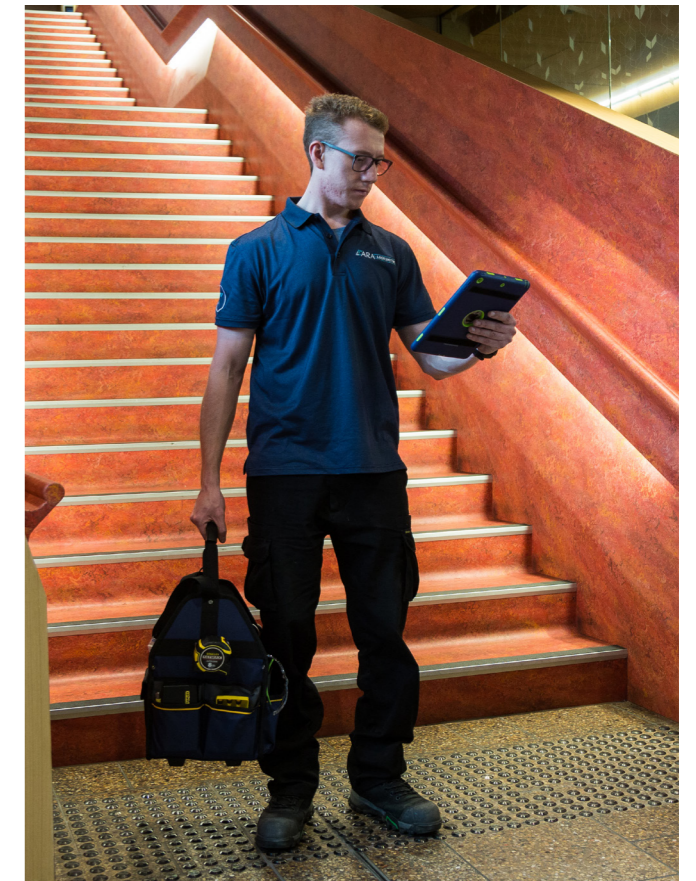
In FY23, the business integrity and compliance function continued the development of our internal online knowledge hub (within the ARA Legal intranet site) as a resource for our employees to readily access a range of information on human rights issues such as modern slavery and human trafficking.

In FY 24 our goal is to provide access to this knowledge hub to external contractors and suppliers.



## Training support for our Suppliers

We also recognise the importance of providing training and support to our suppliers to build their capacity to effectively manage modern slavery risks. Our interactions with our suppliers, those in our extended supply chains and our business relationships are a valuable experiential learning opportunity. We invest time and resources engaging in two-way dialogue to build understanding of international standards on human rights, including modern slavery and providing guidance on implementation of appropriate actions to address potential human rights risks.



# Risk assessment and supplier due diligence

ARA takes an active approach to identifying and managing modern slavery risks in our operations and supply chains through our risk assessment and supplier due diligence processes.

Our business based procurement teams have standard approaches to the way the Group identifies, assesses, and manages modern slavery risks in its supply chains. Importantly, this helps us to understand how our suppliers are producing or sourcing the goods and

services we procure and enables us to make an informed assessment as to suppliers' human rights standards, practices, and management of modern slavery risk in their operations. While the initial scope of the supply chain assurance program was to review any new and recontracting suppliers, our procurement function is currently developing a risk-based plan to prioritise the assessment of remaining suppliers not yet been assessed.

**Over FY23, we continued our focus on maintaining our risk assessment and supplier due diligence activities within our supply chains. Key actions included:**

- assessing human rights risk indicators in our new and recontracting supplier relationships;
- undertaking advanced due diligence of suppliers to assess potential modern slavery risks;
- using our leverage to work with suppliers to implement solutions that meet international human rights standards including, but not limited to, worker labour and payroll conditions;
- continuing to embed bilateral modern slavery clauses in our precedent contracts to require each supplier (including sub-contractors) to assess and address modern slavery risk in its operation and supply chains; and
- building supply chain risk awareness and capability in our operating divisions.

In our approach to addressing our modern slavery risks, we have also considered the potential risk of modern slavery associated with the products and services that we procure, that may have a customer touchpoint.

We have established processes to ensure that both the supplier of the product and, where dictated by risk, the manufacturer of the product have been subject

to due diligence. This means we take steps to assess the standards and practices of the factory where the products are manufactured, even where we do not hold a direct contract with the source factory. We are also developing processes to better capture information in our supplier assessment to obtain greater insight beyond our tier one suppliers.



# Risk management and supplier due diligence

Our risk assessment and supplier due diligence ecosystem has a strong focus on modern slavery and has five elements: identify; assess; mitigate; communicate; and monitor. Our risk assessment and due diligence processes are initiated through the supply chain assurance program, where new and recontracting

suppliers, including third party labour providers are subject to assessment across a range of risk categories, including human rights. These five elements collectively form our approach to managing human rights within our supply chain assurance program.

## 1. Identify

The initial supply chain assessment includes questions that assess key modern slavery risk criteria, such as the country where the product or service is both manufactured and provided, the sector, the category of product or service and how it is to be used by the Group. Where a potential human rights risk is identified (including in relation to modern slavery), our procurement teams enter the supplier into our third-party technology platform (Informed 365) and the supplier risk is referred for triage.

We utilise a range of tools to strengthen our risk assessment program, including from the Global Slavery Index. We also consider information and resources made publicly available.

## 2. Assess

Informed 365 has been designed to assess potential human rights risks by applying weighting and scoring methodology against universally recognised human rights risk indices (such as civil and political rights, labour standards, access to remedy and business integrity), tailored to our environment. The initial assessment of risk is based on three key inputs: the responses to the initial questionnaire described above; the output of Informed 365's screening capability; and a subsequent preliminary risk assessment which is completed by the sourcing business unit.

Where a potential modern slavery risk is evaluated as medium or above, or the supplier is providing a product or service that we have assessed as a higher risk procurement category, the supplier is subjected to a modern slavery desktop assessment. This assessment requires the supplier to answer more in-depth questions in respect of its operation and also the site where the product or service is manufactured or provided from. The supplier is required to provide supporting evidence such as relevant internal policies and procedures, independent site / factory audit reports and evidence of labour practices (overtime, wages, worker conditions). In some instances, the Group will sponsor an independent audit of the supplier's operations or undertake a site visit.

## 3-4. Mitigate and communicate

ARA favours working with suppliers to resolve or substantially mitigate issues identified through our risk assessment and supplier due diligence processes. We recognise the importance of using our leverage to drive change to supplier practices and understand that immediately ending supplier relationships can have potential adverse effects on the livelihood of the supplier's employees. Achieving change in supply chains takes time and can be complex, which is why we seek to share our expertise to support suppliers to build their capability to meet international standards, including in relation to modern slavery. Further information about our Group specific remediation processes is set out in the following section.

## 5. Monitor

Suppliers that are referred to Informed 365 and subsequently approved for onboarding by our Procurement teams, are subjected to continuous monitoring regardless of risk rating. This monitoring activity provides auto-generated alerts of any publicly available negative news screening across a range of categories that include human rights violations, corruption, legal breaches, and allegations of misconduct. This enables us to review and, if necessary, undertake appropriate action with the supplier in a timely manner. Of our 1,000 first tier suppliers that are currently subject to monitoring, 93% are based in low-risk countries, 5% are based in medium risk countries, with 2% based in high-risk countries.

# Assessing the Effectiveness of our Actions

For ARA, effectiveness in managing modern slavery risks means that we effect positive change through our processes and actions and be able to demonstrate and communicate how we do so. For ARA, core components of an effective response to modern slavery includes:

- Robust standards that set clear expectations for workers in our operations and supply chains and are meaningfully communicated to workers, suppliers, and other stakeholders;
- Risk assessment and broader due diligence processes that enable the accurate and timely identification and prevention or mitigation of potential modern slavery risks; and
- Accessible grievance mechanisms to facilitate the reporting and remediation of modern slavery-related complaints.

**During the reporting period, we worked to monitor and assess the effectiveness of our actions in a range of ways, including:**

- Reviewing our risk assessment triggers biannually or in response to key events, to ensure they remain fit for purpose and reflect our evolving risk profile; and
- Following up with suppliers to monitor progress on agreed actions, which helps us to understand whether we are effective in driving change to supplier practices.

# Consultation with Reporting Entities or Controlled Entities

This Statement was developed through a consultation process across the ARA Group.

A final draft of the Statement was made available to each of the reporting entities and the owned and controlled entities covered by this Statement, prior to lodgement and publication.

## A Whole of Group Consultation Process

The Senior Management Team led a Group consultation process to develop this Statement. This consultation process involved the key teams that work together to mitigate and manage potential modern slavery risk in our operations and supply chains, including our Management, Compliance & Procurement, Legal, and Finance functions. These functions provided input to the development of this Statement, and a draft was made available for their review prior to publication.

The Statement was also reviewed by the Group Executive Chairman and CEO, Group CFO, and Group General Counsel and was endorsed by all Divisional Managing Directors of the ARA Group.

## Consultation with Reporting Entities

In addition to the cross-functional consultation process outlined above, separate consultation was also undertaken with representatives of each of the reporting entities covered by this Statement.

We used this additional consultation to inform our understanding of each reporting entity's operations, supply chains and modern slavery risk profile and to confirm their endorsement for the preparation of a joint Statement prepared on their behalf by ARA. This process also provided an opportunity to raise awareness of the actions that are undertaken at a Group level to identify, assess and manage potential modern slavery risks and the role these reporting entities play in supporting these actions.





# The Future

For FY 2024 and beyond, ARA has identified the following as our focus:

## Policies & Governance

- Reinvigorating groups and committees within the ARA Group with responsibility for modern slavery risk management;
- Reviewing and as required, updating our human rights related policies; and
- Embedding modern slavery clauses in all our standard agreements and contracts.

## Risk Assessment & Due Diligence

- Re-assessing the Group's most salient human rights issues to inform our overall strategy;
- Reviewing our due diligence and oversight processes to ensure continued consistent application across all forms of contracted services; and
- Extending the scope of the supply chain assurance program to include any remaining 'un-assessed' supplier base (rather than only new and renewing suppliers).

## Training & Awareness

- Implementing Modern Slavery and Human Trafficking training to support identification and management of modern slavery risks; and
- Developing a supplier engagement strategy to raise awareness and improve accessibility of our Whistle-blower reporting channels for our suppliers and their workers.

## Grievance Mechanisms

- Exploring how we can better provide for trusted and accessible grievance mechanisms, including by modifying our Whistle-blower program to better address modern slavery grievances; and
- Strengthening our remediation processes and response protocols.

## Collaboration & Stakeholder Engagement

- Broadening stakeholder engagement.







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