Modern Slavery Statement

Prepared for Australian Border Force

2020

CERTIS SECURITY

Disclosure Note

This statement has been made on behalf of Certis Australia Pty Ltd. This Statement covers all entities owned or controlled by Certis Australia Pty Ltd which are Certis Academy Australia Pty Ltd, Certis Security Australia Pty Ltd, Certis Security Australia (Victoria) Pty Ltd, Certis Security Australia (WA) Pty Ltd, Newcastle Security Pty Ltd, PSI Corporate Pty Ltd, Sydney Night Patrol & Inquiry Co Pty Ltd, and Corroboree Certis Indigenous Corporation.

These entities will be referred to in this Statement hereafter as "Certis Australia".

EXCLUSIONS

PSI Corporate Pty Ltd – this entity is not currently undertaking any commercial transactions.

AUSTRALIAN BUSINESS NUMBERS

ABN 51 602 871 287 - Certis Australia Pty Ltd

ABN 99 636 999 703 - Certis Academy Australia Pty Ltd

ABN 90 003 762 150 - Certis Security Australia Pty Ltd

ABN 41 105 638 254 - Certis Security Australia (Victoria) Pty Ltd

ABN 34 132 818 421 - Certis Security Australia (WA) Pty Ltd

ABN 71 306 642 945 - Corroboree Certis Indigenous Corporation

ABN 11 124 839 461 - Newcastle Security Pty Ltd

ABN 24 611 391 998 - PSI Corporate Pty Ltd

ABN 11 000 013 098 - Sydney Night Patrol & Inquiry Co Pty Ltd

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About Us

Much like Australia itself, Certis Australia is a unique blend of people, cultures and expertise that make us who we are today. While the Certis name only appeared on the local security landscape in 2016, our family-owned legacy businesses – SNP Security and BRI Security – have been around much longer than that.

SNP Security was started in 1923 and over the years has gathered unparalleled security expertise in industries including aviation, transport, logistics, critical infrastructure and commercial precincts.

BRI Security was established in 1993, and has been a pioneer in harnessing technological innovation to provide leading edge, comprehensive security and safety products and services to the corporate sector.

Certis' acquisition of SNP and BRI is the next evolution in this Australian success story. Beginning in Singapore and backed by over 60 years of experience in physical security, market insights and patented technology innovations, Certis is renowned as a trusted integrated security services provider for businesses around the globe — and now in Australia too.

Vision

To be **the most advanced integrated security services** partner globally, making our world safer, smarter and better by everything we do.

Mission

As **trusted partners**, we protect lives and assets and deliver integrated critical services.

Values

- **Safety**
- Professionalism
- Integrity
- Customer focus
- Team work
- Care
- Courage

Our COVID-19 Response

As we responded to COVID-19, we focused on keeping our people safe and well, maintaining reliable operations and supporting our communities. Part of our work included reviewing the information available from the Australia Government Department of Health, and closely monitoring and responding to the developments in Australia.

THESE RESPONSES INCLUDED

- keeping employees and subcontractors updated on the developments, signs and symptoms of COVID-19, and the testing locations,
- limiting non-essential organized gatherings,
- limiting non-essential meetings and conducting meetings via online video conferencing,
- distributing the Department of Health's COVID-19 infection control training to employees,
- implementing a cohorting strategy,
- transitioning to working from home for office employees, whilst still adhering to the cohorting strategy if it was necessary to be in the office, and
- distributing information and links for counselling and wellbeing services to our staff.

As a result of COVID-19, many services were brought to a halt, including national and international travel. This reduced the required services we provide for many airlines, and many aviation employees were placed on reduced hours for six months, or were made redundant. Where possible, some aviation employees were transferred to incoming requests to provide security officers for COVID-19 purposes, such as temperature testing and ensuring social distancing requirements were adhered to.

We engaged with our suppliers to understand the impact of COVID-19 on their businesses and we continue to work with them to help where we can. Our operations and administration teams worked together to manage critical supplies to support our people out in the communities. We sourced and issued personal protective equipment including face masks and gloves to our staff including subcontractors to minimise the risk of contracting COVID-19.

2020 Modern Slavery Risk Management Initiatives

In 2019/20, we focused on enhancing our understanding of our human rights and modern slavery risks and impacts. With support of external consultants, we undertook a document review and operational gap analysis involving our Senior Leadership Team and members of our Board.

We formed a modern slavery working group, developed a comprehensive modern slavery action plan and a high level three-year road map which will inform our risk management approach over coming years.

We also documented and prioritised our Tier 1 (direct) suppliers and supply categories against modern slavery risk indicators.

Our Plans for 2021

Our plan for 2020/21 is to implement priority actions and continue to raise awareness about modern slavery risks among our employees and contractors.

We will formalize roles, responsibilities and accountabilities for modern slavery risk management and expand our enterprise risk framework to ensure modern slavery risks are integrated into risk assessment processes.

We will continue to update policies, procedures and contract clauses and formally adopt and communicate our modern slavery policy.

Our Plans Beyond 2021

Beyond 2021 we will review, extend, evaluate and improve our modern slavery risk management program.

Our priority will be to establish performance standards and evaluation criteria for our suppliers and contractors, conduct desk-top reviews of our highest risk suppliers and develop collaborative corrective action plans to strive for continuous improvement.

A Brief Statement from Tom Roche, Chief Executive, Australia

Certis Australia fully supports the Modern Slavery Act and the principles it represents.

We are committed to ensuring that modern day slavery does not exist within our business or our supply chain. At Certis Australia, we engage suppliers and subcontractors to provide us with goods and services to assist us in delivering high quality security solutions to our clients. We embrace our responsibilities under the Modern Slavery Act 2018 and will ensure transparency within our organisation and our supply chain.

Certis Australia will not deal with any business involved in modern slavery. As part of our due diligence processes for modern slavery, we will consider the risk of this occurring within the supply chain when selecting and monitoring our suppliers and subcontractors.

We are committed to developing supply chains that respect people and human rights, where no children or adults are subject to forced or dangerous labour practices. We don't engage child labour in our workforce and will be working with other stakeholders (industry, government and non-governmental organisations) to address the complex issues and to support measures to protect and uphold the rights of people and communities in our supply chain.

Our Senior Leadership Team take responsibility for implementing and monitoring our modern slavery program. Our program will provide adequate resources in training and awareness to ensure that our staff and supply chain are aware of our responsibilities to prevent slavery. Certis Australia's annual Modern Slavery Statement sets out our initiatives and actions to assess and address modern slavery risks in our business and supply chain.

Reporting Criteria 1 & 2: About Certis Australia

Our Organisational Structure

Certis Australia Pty Ltd is the holding company and 100% owner of Certis Security Australia Pty Ltd, Certis Academy Pty Ltd, Certis Security Australia (Victoria) Pty Ltd, Certis Security Australia (WA) Pty Ltd, and Sydney Night Patrol & Inquiry Co Pty Ltd.

Sydney Night Patrol & Inquiry Co Pty Ltd owns 100% of Newcastle Security Pty Ltd and PSI Corporate Pty Ltd.

Additionally, Sydney Night Patrol & Inquiry Co Pty Ltd is a 49% shareholder of Corroboree Certis Indigenous Corporation.

Certis Group Structure - Australia
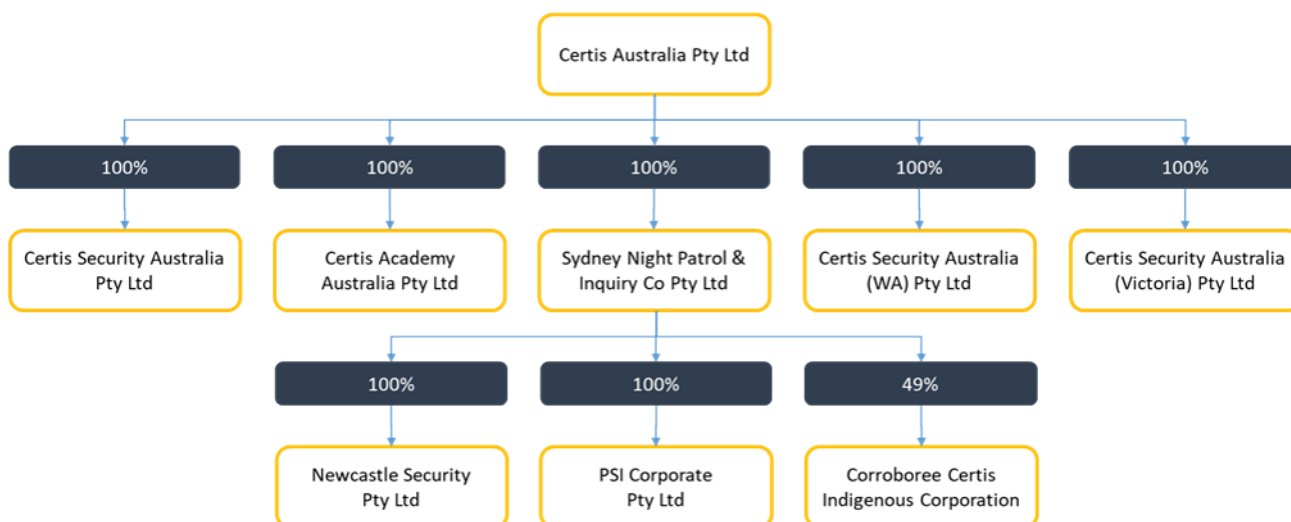
Our Operations

PEOPLE
We have **3,059** employees.

OFFICE LOCATIONS

Head Office West Ryde, NSW	Newcastle Office	Melbourne Office
Aviation Office Mascot, NSW	Canberra Office	Brisbane Office
Perth Office	Adelaide Office	

Mobile Patrols

Our mobile security patrol services and patrol guards include:

- Perimeter patrols
- Site inspections
- Alarm response
- Emergency response
- Patrol vehicles

Concierge & Customer Service

Our concierge & customer service solutions include:

- Corporate reception duties
- Meeting and greeting customers
- Signing in and escorting visitors
- Administration assistance
- Booking meeting rooms
- Allocating visitor parking

Traffic Management

Our traffic management services include:

- Airport kerb-side traffic management
- Road works traffic management
- Event security patrol and crowd control

Temperature Testing

We provide security services together with products to help measure the temperature of your staff and visitors to reduce the risk of spreading COVID-19.

- Work Safety functions
- Worksite supervision
- Vehicle escorting

Physical Security

Our physical security services include:

- Enforcement services
- Integrated operations centre
- Security guards and/or officers
- K9 services
- Access control
- Australian Government Security Cleared Officers
- Rail Industry Worker Trained Security Guards

Aviation Security Services

Our aviation services throughout 8 Australian Airports include:

- Aviation screening
- Checked baggage screening
- Perimeter security patrol
- Anti-touting enforcement
- Traffic enforcement
- Airport pass issuance
- Customer greeting & queue management
- Landslide concierge coordination, taxis, hire cars, foot pedestrians
- Work Safety Officers, landslide & airside

Screening services

Our screening services include:

- Baggage screening
- Passenger screening
- Mall room screening
- Freight screening
- Cargo examination screening

Work Safety Officers

Our work safety officers will, in accordance with aviation security requirements, conduct:

- Work Safety functions
- Worksite supervision
- Vehicle escorting

Our Supply Chain

Certis Australia's Tier 1 suppliers and subcontractors are predominantly located in Australia. Further data is to be obtained in regard in the location of Tier 2 and the extended supply chain.

We procure from our suppliers goods and services to run our business. The main categories of those goods and services are corporate fees and expenses; property management and business support services; ICT and electronic equipment, components and supplies; fleet and hire vehicles, consumables and maintenance; professional services; ICT software, networking and support services; print and mailing; utilities; recruitment fees and services; uniforms and PPE; property maintenance services; and office and building supplies and services.

Our procurement practices are supported by various business ethics programs. This includes our Code of Conduct, and our Whistleblowing hotline that allows employees, suppliers and other stakeholders to report illegal or unethical practices through a reporting channel that is managed by an independent legal firm.

We also engage subcontractors to support our workforce of direct employees. Our selection process is segregated from site operations. This involves exercising due diligence when assessing a potential subcontractor, so that an independent and informed decision is made. If we proceed with engaging the subcontractor we apply various monitoring processes such as security licence verification of their staff against the public register, electronic time and attendance with biometric verification of all staff for guard shifts, oversight of rosters and fatigue indicators, as well as audits of our key subcontractors.

The subcontractors in our supply chain are assessed independently of our other suppliers. That analysis will be included in the 2021 Modern Slavery Statement.

Spend Category - Suppliers

- Corporate fees and expenses
- Professional services
- Hire cars, fleet, consumables and maintenance
- Print/Mail Provider
- Recruitment fees and services
- Clothing / PPE / Other personal equipment

- Property management and business support services
- ICT and electronic equipment, components and supplies
- ICT software, networking and support services
- Utilities
- Advertising, marketing and promotions
- Other

Reporting Criteria 3: Modern slavery risks in operations and supply chain

Our focus in 2019/20 was to enhance our understanding of potential human rights and modern slavery risks in our operations and supply chain. We started our journey in August 2019 with a modern slavery gap analysis workshop that included most of our Senior Leadership Team representing business operations, finance, human resources, information technology, technology services, protective services, enterprise risk management, group legal and corporate affairs, and risk, safety and compliance.

Using external expertise, we undertook a preliminary assessment of the salient human rights issues relevant to Certis Australia, acknowledging that the severity of issues differs across our organisation's value chain. Through this assessment we identified that the highest potential risk is within our supply chain, particularly where visibility is limited beyond our Tier 1 suppliers. As such, our efforts in 2019 focused on obtaining a deeper understanding of our supply chain risks and our operational processes to manage those risks.

In 2020 we will assess our subcontractors to identify modern slavery and other potential human rights risks and implement actions to manage and mitigate identified risks.
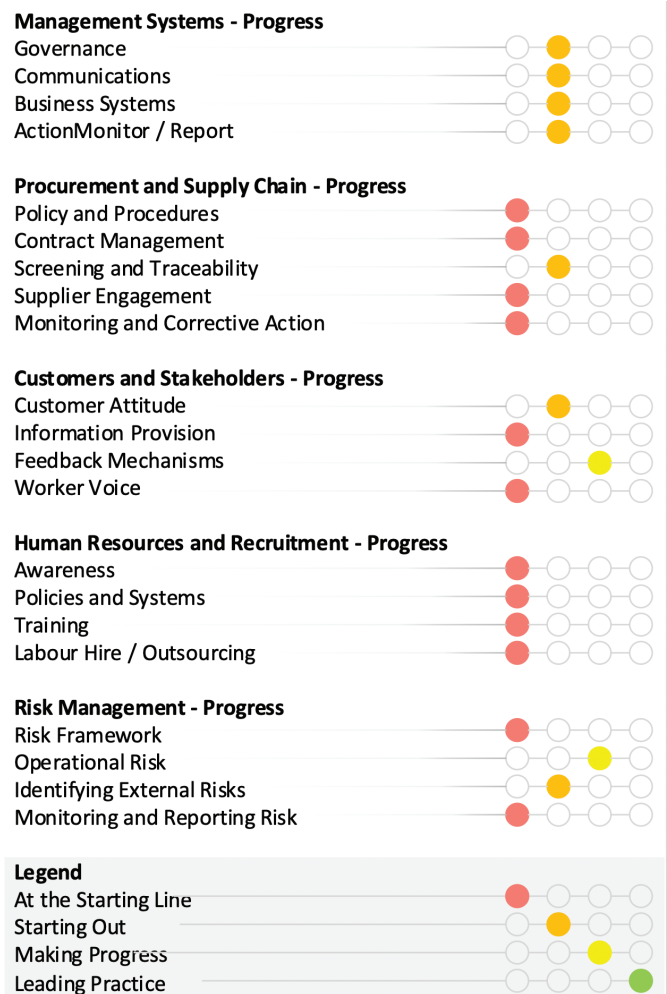
Operational Risks

MODERN SLAVERY GAP ANALYSIS

We undertook a modern slavery gap analysis to identify areas of improvement across five key categories: management systems, human resources and recruitment, procurement and supply chain, risk management and customers and stakeholders.

The analysis identified gaps and opportunities for better managing our response to modern slavery risks and human rights due diligence more broadly. While we have made some progress towards governance maturity specific to modern slavery, we acknowledge that there is more to do.

Our modern slavery action plan and three year road map, developed collaboratively with key representatives across our organisation has established a clear pathway for us to follow. Elements of our action plan and three year roadmap are included in Criteria 4, 'Actions to assess and address risk'.

Results of our modern slavery gap analysis:

Management Systems - Progress

Item	Progress
Governance	Starting Out
Communications	Starting Out
Business Systems	Starting Out
ActionMonitor / Report	Starting Out

Procurement and Supply Chain - Progress

Item	Progress
Policy and Procedures	At the Starting Line
Contract Management	At the Starting Line
Screening and Traceability	Starting Out
Supplier Engagement	At the Starting Line
Monitoring and Corrective Action	At the Starting Line

Customers and Stakeholders - Progress

Item	Progress
Customer Attitude	Starting Out
Information Provision	At the Starting Line
Feedback Mechanisms	Making Progress
Worker Voice	At the Starting Line

Human Resources and Recruitment - Progress

Item	Progress
Awareness	At the Starting Line
Policies and Systems	At the Starting Line
Training	At the Starting Line
Labour Hire / Outsourcing	At the Starting Line

Risk Management - Progress

Item	Progress
Risk Framework	At the Starting Line
Operational Risk	Making Progress
Identifying External Risks	Starting Out
Monitoring and Reporting Risk	At the Starting Line

Legend

Level	
At the Starting Line	(red)
Starting Out	(orange)
Making Progress	(yellow)
Leading Practice	(green)

Supply Chain Risks

In 2020 an internal Working Group supported by external experts analysed approximately $28 million of procurement data for FY 2019/20 for potential modern slavery risk. Four key risk factors were used to assess the data for risk:

- **Industry sector** – Specific industry sectors (for example manufacturing, services, agriculture etc.) deemed as high risk in international and national guidance documentation;

- **Commodity/product** – Specific products and commodities deemed as high risk by the US Department of Labor's 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials;

- **Geographic location** – Based on estimated in-country prevalence of modern slavery determined by a custom risk index developed by the external experts engaged to support our program. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of suppliers' headquarters which may have elevated risk of poor labour standards and modern slavery;

- **Workforce profile** – In undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable or migrant labour is used, or where the work is deemed as '4D' work (Dirty, Dull, Degrading or Dangerous). We recognise that poor labour practices are present in some parts of our sector and we are committed to conducting our business as a responsible and ethical member of our community.

High level findings

- Overall, there is moderate potential modern slavery risk in Certis Australia's supply chain;

- Approximately 15% ($3.6M) of total spend analysed is potentially high risk for modern slavery;

- One-quarter of Certis Australia's suppliers (27 suppliers) are considered potentially high risk for modern slavery;

- Eight of the 18 spend categories analysed are potentially high risk;

- Levels of potential risk varied within Certis Australia's internal divisions.

Data at a Glance

Certis Group entities and sub-entities analysed:	**7**
Total Spend:	**$23,507,752**
Total Suppliers:	**113**
Supplier Spend range analysed (largest to smallest)	**$3.6M - $18,000**
Number of spend categories (goods and services)	**18**
Category spend range (larges to smallest)	**$6.3M - $24,000**

Notes:

1. Our focus in FY 2019/20 has been on Tier 1 suppliers with spend greater than $18,000. We recognise that there may be significant risk amongst our smaller suppliers and will incorporate these into future risk assessments.

2. Subcontractors were excluded from the analysis and will be included in our 2021 Modern Slavery Statement.
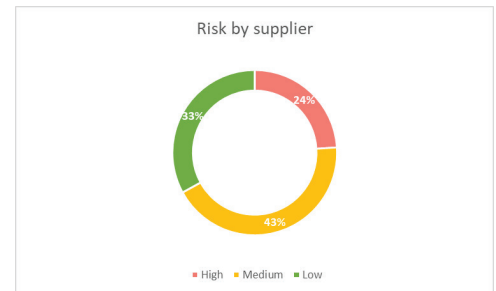
Risk by Spend

Analysis of $23.5M of spend across seven Certis Australia entities covered by this statement indicates that 15% of spend is potentially high risk for modern slavery. Based on levels of risk reported in publicly available modern slavery statements by other corporate entities listed on the Federal Government's Modern Slavery Statement Register this could be considered a moderate level of risk.

Risk by spend

Risk by Supplier

Analysis of higher spend suppliers (see 'Notes' above) indicates that 27 suppliers or approximately one quarter of the 113 suppliers analysed are potentially high risk for modern slavery with a further 49 (or 43%) considered to present medium-level risk.

Whilst most of our suppliers based in Australia (or with head offices in Australia) are considered to present a lower risk, we intend to gather further data on the geographic location of all Tier 1 and Tier 2 suppliers for our FY 2020/21 Statement. This will enable us to gain a broader picture of potential risk in our extended supply chain, engage a wider range of suppliers that are potentially high risk and take practical action to manage and mitigate the risk.

Risk by supplier

Risk by Spend Category

Based on the four risk factors outlined above, we consider eight of our 18 spend categories as presenting potentially high risk for modern slavery.

Our five highest procurement risk categories are:

- ICT, electronics and communications equipment;

- Uniforms and Personal Protective Equipment;

- Building and engineering materials;

- Property and facility maintenance services (e.g. maintenance and cleaning); and

- Office equipment and supplies.

Risk by spend category

Property management and support services is our largest medium risk spend category and consists of spend with national airports on goods and services such as rent, parking, security checks and passes, and utilities such as energy, water and waste management.

Risk by Division

Potential modern slavery risk varied significantly between internal divisions . Variations in potential risk are largely due to the types of goods and services used in the operations of the individual divisions. For example, divisions such as Protective Services that procure large quantities of ICT, electronics and communications equipment or uniforms and Personal Protective Equipment – have higher levels of potential risk as opposed to Corporate Services that have a higher spend with professional service providers and government agencies. This information will help inform and focus our future efforts to manage modern slavery risk in our supply chains.

Reporting Criteria 4: Actions taken to assess and address risk

Our modern slavery gap analysis informed the development of our Modern Slavery Action Plan and three-year road map. This was finalised towards the end of our reporting period and will be implemented in the 2020/21 reporting year.

Modern slavery action plan and road map

Our cross-disciplinary team, which included members of our Senior Leadership Team in Australia and Singapore, worked collaboratively to develop a focused action plan and a three-year road map. These include actions for enhancing our approaches to modern slavery governance, due diligence, risk and compliance; procurement and supply chain systems and processes; training and communications and labour hire contract management.

The following actions were completed during our first reporting period.

MODERN SLAVERY WORKING GROUP
We formed a Working Group with representatives from across our operations to lead our modern slavery risk management program and implement our action plan and road map.

BOARD ENGAGEMENT
Our modern slavery gap analysis workshop was the first step in engaging board members in Australia and Singapore. Since the initial engagement, we have continued to communicate our progress to the board and seek input and support on this important issue from our directors and executive. Regular updates are provided to the Group Executive Committee through a monthly reporting framework.

SUPPLIER RISK IDENTIFICATION AND PRIORITISATION
We reviewed and prioritised our highest spend suppliers against modern slavery risk indicators and identified five high-risk procurement categories. We will focus our supplier due diligence program on these categories in 2020/21. Additionally, in 2020/21 we will assess our subcontractors to identify modern slavery and other potential human rights risks and implement actions to manage and mitigate identified risks.

MODERN SLAVERY ROADMAP
Our focus for year 1 was on reviewing existing systems and processes for managing operational and supply chain modern slavery risks, and determining our highest risk/highest priority suppliers and building a modern slavery risk management framework. Year 2 will focus on implementing key actions and enhancing our due diligence processes for our priority suppliers and contractors. In Year 3 we will focus on monitoring and reviewing progress as part of our commitment to continual improvement.

DOCUMENT AND POLICY REVIEW
Certis Australia has developed a range of internal tools and policies to help identify and manage human rights and labour rights risks. In 2019, we engaged external expertise to undertake a review of key policies and provide recommendations for how broader human rights and modern slavery risk management can be better integrated into these policies and processes. Following from that, a number of policy and procedures in regard to the supply chain were selected for review.

YEAR 1	YEAR 2	YEAR 3
APRIL 2019 – MARCH 2020	**APRIL 2020 – MARCH 2021**	**APRIL 2021 – MARCH 2022**
Establish Framework	**Implement Priority Actions**	**Review, Extend, Evaluate & Improve**
Gap analysis completed	Expand risk framework and further map operations against potential risk of modern slavery	Map modern slavery risks and vulnerabilities along extended supply chain
Action plan and three-year roadmap developed	Document roles, responsibilities and accountabilities and governance framework for managing modern slavery risks across the organisation	Develop procedures to effectively respond where modern slavery risks are identified
Working Group established	Update existing procurement policies and procedures	Incorporate evaluation criteria for high-risk contracts
Board and Senior Leadership Team engaged	Educate senior management on modern slavery risks and legislative requirements	Review compliance with contract clauses and work with suppliers to address non-compliance
Tier 1 suppliers identified and prioritised according to modern slavery risk	Undertake risk prioritisation of subcontractors	Establish supplier monitoring program
Draft Modern Slavery Policy developed	Promote/communicate modern slavery policy internally and externally	Develop modern slavery supplier engagement strategy
	Create modern slavery awareness program for staff and contractors	Conduct a desk-top review of high risk/high priority suppliers
	Expand Whistleblower Policy and process to include modern slavery response mechanisms	Develop corrective action plans with highest risk suppliers

Reporting Criteria 5: Effectiveness Assessment

Track and review action plan

The modern slavery action plans are tracked by the Compliance team to monitor progress and review the actions taken for effectiveness. During Year 2, key performance indicators will be formalised and incorporated into the action plans to assist in assessing the effectiveness of the actions being taken.

Senior Management Review

The Compliance team monitor the Modern Slavery Program initiatives and plans. The progress of action plans are tracked and presented to the Senior Leadership Team annually for consultation and review.

Our Risk Assurance Framework

FIRST LINE OF DEFENCE - COMPLIANCE TEAM

The Compliance Team oversee the Modern Slavery Program for Certis Australia. This is the first line of defence for managing the program including the risk management initiatives and plans. Key risk indicators are identified through the risk management initiatives and reported monthly through the risk management framework.

SECOND LINE OF DEFENCE – GROUP RISK COMMITTEE

The Group Risk Committee forms the second line of defence, is an independent and centralised function responsible for analysing, assessing, and managing risk across Certis. This Group design and oversee the implementation of the risk management framework. All material risk is monitored by the Group Risk Committee.

THIRD LINE OF DEFENCE - GROUP INTERNAL AUDIT

The Audit division as the third line, provides independent and objective risk-based assurance to the Group Board. Internal Audit assess whether material risks have been properly identified and key controls have been properly designed and operate effectively and sustainably to mitigate those material risks.

Reporting Criteria 6: Process of consultation with entities owned or controlled

The Certis Australia entities share the same Senior Leadership Team. As a member of the Senior Leadership Team, the Head of Compliance oversees the Modern Slavery Program for Certis Australia.

The Head of Compliance briefs the Senior Leadership Team on the progress of the Modern Slavery Program initiatives, plans, and the effectiveness of our program. This information is then cascaded through the Australian entities by the other members of the Senior Leadership Team.

Reporting Criteria 7: Other

Sustainability Advantage Program

The sustainability Advantage Program helps organisation's understand sustainability and strengthen their environmental performance. The program is a business support service from the NSW Department of Planning, Industry and Environment (the Department).

Certis Australia became a Member of Advantage Sustainability in 2010, and has been a Silver Partner since 2014 in acknowledgement of our significant environmental achievements.

For Certis Australia to achieve Silver Partner Status, we demonstrated:

- an active participation,

- leadership and commitment to sustainability,

- planning and management systems to support sustainable practice, including processes for continuous improvement, and

- engagement for sustainable outcomes with employees, suppliers, customers, stakeholders and the wider industry.

Certis Australia is committed to further strengthening its sustainability performance through collaboration with the Department.

Sustainability Advantage
Silver

Our Approvals

This statement was approved by the board of directors of Certis Australia Pty Ltd on 29 December 2020.

Tom Roche
Chief Executive, Australia

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