

# NON-MANDATORY MODERN SLAVERY STATEMENT JUNE 2024



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## INTRODUCTION

### Purpose

The purpose of our Modern Slavery Statement is multi-faceted, serving as a key component in the global effort to eradicate modern slavery practices. This statement is not merely a compliance document; it embodies Ozland Group Solutions' commitment to ethical and responsible business practices. It is not mandatory for Ozland Group Solutions to submit an annual Modern Slavery Statement at this time, however, we have still documented a Modern Slavery Statement for the purposes of updating our key clients and team members on our performance in the area of ensuring that there is no Modern Slavery within our Supply Chain Network.

Here are the primary purposes and benefits of our Modern Slavery Statement:

1. **Transparency:** It promotes transparency in our operations and supply chains, providing stakeholders, including customers, investors, and the public, with insight into the steps the organisation is taking to combat modern slavery.
2. **Accountability:** The statement holds the organisation accountable for its actions and progress in identifying, preventing, and mitigating the risks of modern slavery within its operations and supply chains. It compels organisations to continually assess and improve their practices.
3. **Risk Management:** It helps in identifying, assessing, and managing risks related to modern slavery. By publicly outlining the steps taken to address these risks, our organisation can better manage our reputational, operational, and legal risks.
4. **Stakeholder Confidence:** Demonstrating a commitment to human rights and ethical practices can enhance trust and confidence among consumers, investors, and business partners. It signals that our organisation is a responsible and ethical entity, which can be a significant competitive advantage.
5. **Ethical Supply Chains:** It encourages our organisation to take a closer look at our supply chain, fostering more ethical and sustainable practices. This can lead to improvements in working conditions and the protection of vulnerable individuals from exploitation.
6. **Awareness and Education:** The process of drafting the statement can raise awareness and increase understanding of modern slavery issues within the organisation. It also educates employees, suppliers, and the broader community on the importance of combating modern slavery.
7. **Collaboration:** By sharing practices and challenges, organisations can encourage and facilitate collaboration within and across industries to address modern slavery more effectively. This collective action can lead to innovative solutions and stronger industry standards.

Ultimately, our Modern Slavery Statement is a critical tool in the global fight against modern slavery, helping to ensure that businesses operate ethically, responsibly, and in a manner that respects human rights. It reflects our organisation's commitment to making a positive impact on society and the lives of those who may be vulnerable to exploitation.



## OUR ORGANISATION

### Overview of the Organisation

Our organisation specialises in the provision of Facilities Services to property owners and brands within the Australian and New Zealand markets.

Key Services that we provide are Security, Cleaning, Maintenance and Concierge Services.

The majority of our services are provided using a direct employment model whereby we ensure that each employee is compliant with the right to work within Australia. In addition to this, we also have deployed a payroll system that incorporates Award interpretation to ensure that all employees are paid correctly.

In the provision of the services, we engage a number of suppliers to provide:

- Cleaning Products
- Cleaning Equipment
- Technology – Software and Hardware
- Uniforms



## OUR POLICY ON MODERN SLAVERY

# Modern Slavery Statement

for the financial year ended 30 June 2024

### **Ozland Group Services Pty Ltd**

Trading as Ozland Group Solutions  
Level 3/55 Pyrmont Bridge Road  
Pyrmont NSW  
Australia

ABN 40 643 551 884

This statement is made by Ozland Group Solutions in accordance with s13 and s16 of the Modern Slavery Act 2018 (Cth) (the Act) for the year ending 30 June 2024.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking.

Ozland Group Solutions is committed to, and expects its contractors, customers, distributors, suppliers and other business partners to also be committed to:

- Act ethically and with integrity in all aspects of business;
- Implement effective systems and controls to ensure modern slavery in any part of their supply chains is not tolerated; and
- Provide transparency in reporting obligations under the Modern Slavery Act 2018 (Cth) (the Act)

Ozland Group Solutions is committed to assessing, monitoring, and mitigating the risks of modern slavery and broader human rights risks across its supply chains in line with the Group's corporate values, stakeholder and community expectations and the law.

The Act requires reporting entities to address seven criteria in its annual modern slavery statements.

Ozland Group Solutions addresses each criterion below.

### **Criterion 1 – identify the reporting entity.**

The reporting entity is Ozland Group Services Pty Ltd trading as Ozland Group Solutions ABN 40 643 551 884. This statement is a joint statement made by Ozland Group Solutions and its wholly owned subsidiaries.



**Criterion 2 - describe the reporting entity's structure, operations and supply chains.**

Ozland Group Services Pty Ltd is a company incorporated in Australia with annual revenue that does not exceed the Modern Slavery Act's minimum mandatory reporting threshold of \$100 million.

The Group's business is the provision of commercial and industrial Security and cleaning in Australia. Key product for the cleaning operations are cleaning chemicals. There are no products supplied for the security operations.

As of 30 June 2024, Ozland Group Solutions employed more than 417 people (including casuals), with 75% of our team employed in permanent full-time roles.

The Board of Ozland Group Services Pty Ltd (Board) has ultimate authority and oversight over Ozland Group Solutions and regards corporate governance as an important element in achieving the Group's objectives. Accordingly, the Board has adopted appropriate charters, codes and policies and established several committees to assist in the discharge of its duties.

Ozland Group Solutions recognises the impact of COVID-19 and the potential increased risk of modern slavery in its supply chains and has implemented corrective actions to increase the awareness and reduction of such risks through policies, risk assessments and awareness training.

The Group's supply chains are Australia based.

The Group's material suppliers are Australian.

Ozland Group Solutions continually works with key suppliers to review supply agreements and suppliers' statements as part of the invoicing and service level agreements in line with its Modern Slavery and Anti-Human Trafficking Policy (Policy) to ensure risks in an evolving supply chain are promptly identified and addressed. Ozland Group Solutions requires suppliers and customers to comply with this Policy.

For FY25, Ozland Group Solutions will further support its team members by building leaders' communication skills to embed two-way feedback into everyday operations, with a particular focus on company culture, our values, and workplace safety.

This annual declaration ensures all suppliers in the Ozland Group Solutions supply chain undertake an annual self-compliance check, are operating in a socially acceptable manner, in compliance with all legislative requirements, meets Ozland Group Solutions policies and meets the reporting requirements of the Act.

All providers within the Ozland Group Solutions supply chain, must provide an annual declaration of compliance with the Act and the Policy. This annual declaration ensures all suppliers undertake an annual self-compliance check, are operating in a socially acceptable manner, in compliance with all legislative requirements and comply with Ozland Group Solutions policies.



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**Criterion 3 - describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.**

The Group's risks assessment process centred around the principles of the Slavery & Trafficking Risk Template (STRT) by the Social Responsibility Alliance (SRA). The STRT is an open-source industry framework used by many companies to assist their efforts to comply with human trafficking and modern slavery legislation and improve their supply chain-related public disclosures. Ozland Group Solutions has implemented the STRT framework to help Ozland Group Solutions and its suppliers work together to build socially responsible supply chains by facilitating accurate data collection.

Within the Group's operations, there is a small number of migrant workers which have been identified as a potential modern slavery risk. Some of these migrant workers are directly employed by Ozland Group Solutions and others are employed through third party employment services providers. While many of the Group's migrant workers are Australian permanent residents or holders of temporary and/or skilled worker visas that allow them to work in Australia, Ozland Group Solutions recognises the increased vulnerability of migrant workers and continues to take steps to uphold and maintain all work rights and ethical standards.

However, the Group's management processes, including working rights checks (both initial and ongoing) and onboarding procedures, has resulted in a low risk assessment of modern slavery in relation to its migrant workers.

**Criterion 4 - describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.**

Annual audits by Ozland Group Solutions suppliers and customers require Ozland Group Solutions to supply data and satisfy which are sometimes confirmed during the site visits. Ozland Group Solutions has successfully completed all audits without any concerns or issues raised.

Ozland Group Solutions is committed to achieving the following equal employment opportunity objectives:

- Ensuring that all recruitments and promotions are based on objective assessments to determine the best qualified candidates for the role.
- Ensuring all employees are treated fairly in a safe and respectful work environment through internal policies and company culture; and
- Fully utilise and develop the potential of every employee.

Ozland Group Solutions has implemented various policies, programs and procedures to mitigate modern slavery risks across its operations and supply chains. These include, but are not limited to:

- Ensuring all Group team members hold relevant working rights in Australia and ensuring compliance with all visa conditions where applicable;
- Training for team members covering fundamental governance principles, including the Groups code of conduct, grievance mechanisms, workplace behaviours;
- Resources dedicated to human resource management and policies to address modern slavery and anti-human trafficking;
- Resources, systems and processes to administer team member payments; and
- Incorporating obligations within its contracts with third parties to mitigate modern slavery risks in its supply chains both up and down stream.





**Criterion 4 continued**

In addition, Ozland Group Solutions has developed systems and databases to guide and streamline its supplier risk assessment process which requires suppliers to complete a questionnaire. These questionnaires:

- Help Ozland Group Solutions obtain key data about its supplier's operations which can be used to support its modern slavery risk assessments;
- Allow the system itself to generate an initial risk profile; and
- Provide a repository of suppliers and key details to assist program administration.

Once a supplier risk is identified by the Group, suppliers may be required to undertake an ethical audit.

In most circumstances, any suppliers that are assessed as high risk will require an audit every 12 months and a supplier assessed as moderate risk will require an audit every two years.

Through suppliers' participation in the Group's risk assessments, Ozland Group Solutions can monitor and evaluate its upstream supply chain and take appropriate actions to mitigate risks.

While non-conformances identified during these risk assessments and audits have not identified any confirmed cases of modern slavery, Ozland Group Solutions will continue to monitor its operations and supply chains for any indicators of modern slavery risks being present.

Over this reporting period, Ozland Group Solutions has made significant progress in implementing policies and procedures to support assessment of modern slavery risks in its own operations and through its supply chains.

Ozland Group Solutions periodically executes formal written agreements with its customers and suppliers. These agreements may contain express provision required both parties to comply with the Act and the Groups various polices including the Policy.

In addition to contractual obligations, Ozland Group Solutions requires annual declarations of compliance with the Act and the Policy. This declaration ensures all suppliers undertake an annual self-compliance check to ensure that they are operating in a socially acceptable manner, in compliance with all legislative requirements, in compliance with Ozland Group Solutions policies.

**Criterion 5, 6 and 7 - describe how the reporting entity assesses the effectiveness of these actions; describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement); and provide any other relevant information.**

The comprehensive review that was undertaken in preparation for this statement included a review of the operations of the entities which Ozland Group Solutions owns and controls.

Ozland Group Solutions believes that its continued efforts to assess, monitor and mitigate modern slavery will further contribute to its ethical culture across the business and increase awareness of the importance of the abolishment of modern slavery throughout its supply chains.

This statement has been approved by the Board of Ozland Group Services Pty Ltd.

Yours sincerely,

**James Carlile**  
**Group Chief Executive Officer**

June 30<sup>th</sup> 2024 - Review June 30<sup>th</sup> 2025.





## DUE DILIGENCE PROCESSES

We have implemented a process to audit each of our suppliers to ensure compliance to Modern Slavery Legislation.

The process is as follows:

- Complete the Modern Slavery Survey (<https://ozland.biz/ModSlave>)
- General Manager of Risk and Compliance reviews answers
- If additional information is required, it is then requested
- If answers meet legislative requirements they are stored on our SharePoint
- This process is conducted annually

## RISK ASSESSMENT

### Methodology for Risk Assessment

Assessing the risk of modern slavery within our organisation's operations and supply chains is a complex but crucial process. The methodology for this risk assessment typically involves several key steps, designed to identify, analyse, and prioritise risks related to modern slavery.

This process ensures that efforts to mitigate these risks are appropriately targeted and effective.

Below is a detailed outline of a typical risk assessment methodology for our modern slavery statement:

### **1. Scope Definition**

- **Identify the Boundaries:** Determine the scope of the assessment, including which parts of the organisation and which elements of the supply chain will be examined.
- **Stakeholder Engagement:** Identify internal and external stakeholders relevant to the risk assessment process.

### **2. Data Collection**

- **Internal Data:** We gather internal data on our operations, labour practices, and supply chains. This includes employee data, supplier lists, procurement practices, and existing compliance mechanisms.
- **External Data:** We collect external information as detailed in the due diligence section above that can impact risk assessment, such as country risk profiles, sector-specific risks, and intelligence on suppliers.

### **3. Risk Identification**

- **Map the Supply Chain:** We map the tiers of the supply chain, identifying where there is limited visibility or control.
- **Identify Risk Factors:** We look for indicators of modern slavery risk, such as reliance on migrant labour, use of high-risk countries or sectors, and reports of poor labour practices among suppliers.



#### 4. Risk Analysis and Evaluation

- **Analyse Risks:** We then evaluate the likelihood and potential impact of identified risks. This can involve assessing the severity of potential harm to individuals and the likelihood of risks materialising.

#### 5. Risk Mitigation Planning

- **Develop Action Plans:** If we don't identify a risk, we develop specific actionable plans to mitigate the risk. This may include changing suppliers, implementing stricter contract clauses, or enhancing worker education and grievance mechanisms.

#### 6. Monitoring and Review

- **Continuous Monitoring:** We have established an annual process for ongoing monitoring of risks and the effectiveness of mitigation measures.
- **Review and Adjust:** As part of this process, we regularly review the risk assessment and mitigation strategies, adjusting them as necessary based on new information or changes in the operational or supply chain environment.

#### 7. Documentation and Reporting

- **Document the Process:** We keep detailed records of the risk assessment process, findings, and actions taken.



## FINANCIAL YEAR 2024 KEY PERFORMANCE INDICATORS (KPIs)

Detailed below are our Key Performance Indicators (KPIs) for June 2024:

### 1. Supplier Audits and Assessments

- **Number of supplier audits conducted** – 23
- **Percentage of suppliers assessed** – 100%

### 2. Risk Identification and Mitigation

- **Number of high-risk suppliers identified** – NIL
- **Percentage reduction in identified risks** – 0%

### 3. Training and Awareness

- **Number of employees and suppliers** – All employees have received awareness training about Modern Slavery as part of their onboarding process. This has been reinforced by issuing on an ongoing basis an online module that includes information about Modern Slavery.
- **All suppliers complete a modern slavery survey** at the onboarding supplier review and approval process, suppliers also acknowledge alignment to Ozland's Modern Slavery Policy, quarterly a supplier statement is completed for continuous alignment.

### 4. Reporting Mechanisms

- **Number of modern slavery incidents reported** - NIL
- **Response time** – Ozland's Modern Slavery Commitment is that of a 12-hour maximum turnaround in relation to incidents reported, of which to date is zero.

### 5. Supplier Compliance

- **Percentage of suppliers signing a code of conduct** – 100%
- **Number of supplier contracts terminated due to Modern Slavery noncompliance** – NIL

### 6. Remediation Actions

- **Number of victims of modern slavery identified** – NIL
- **Effectiveness of remediation measures** – N/A

### 7. Policy Implementation

- **Progress in implementing key policies** related to modern slavery (e.g. supplier codes of conduct, employee training programs). As detailed above, we have made significant progress in the last 12 months ensuring around employee awareness, supplier code of conduct, supplier auditing and compliance.

### 8. Continuous Improvement

- **We have continued to make improvements in risk assessment methodologies** to better identify and address modern slavery risks, such as the introduction of our online auditing process.



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## CONSULTATION

Ozland operates and is managed as an integrated group, with overarching policies, systems and process that are consistent across our business and its functions.

During the reporting period, we actively engaged and consulted with all companies we own or control in the development of this statement, of which included the Australian reporting entities that were outlined in this statement.

As part of the development of the statement, we established a “Modern Slavery Statement Working Group”, to oversee the preparation of the statement.

Senior executives and key representatives from Risk and Compliance, Human Resources, along with other internal stakeholders met to raise awareness and understand their approach in mitigating modern slavery risks.

The group provided an early outline of the statement, and reviewed the statement, before it was put to the CEO and Managing Director for final review and approval.

Ozland are committed to working with and learning from peer companies, suppliers, customers and civil society to continuously improve our understanding of modern slavery risks, controls and the evolving regulatory environment.

## FUTURE COMMITMENTS

Our plans for the upcoming year are:

- Strive for 100% supplier signatory to supplier code of conduct
- To better understand any suppliers that source from countries overseas that could be deemed at risk from a Modern Slavery perspective
- Continue to build awareness within the Ozland Group about Modern Slavery and how to report any concerns with regards to Modern Slavery

## APPROVAL AND SIGN-OFF

Our statement has been approved at the highest level of the organisation. This will be signed by the Chief Executive Officer.

**James Carlile**  
**Group Chief Executive Officer**  
June 30<sup>th</sup>, 2024