

*“We can’t say our people are  
our most valued asset and not  
prioritise Modern Slavery”*

– Vadim Gurevich, Managing Director

# Modern Slavery Statement 2024



**CHALLENGER**  
— SERVICES GROUP

# 1. Challenger Services Group Introduction



**Vadim Gurevich**  
Managing Director

This is the first Modern Slavery Statement for Challenger Services Group, which outlines the steps we have taken to identify, manage and mitigate the specific risks of modern slavery in our operations and supply chain.

## Introduction

At Challenger Services Group (herein referred to as Challenger), we believe in contributing to the creation of a fair and inclusive society, free of exploitation, where every individual can strive to achieve their full potential.

## Our purpose is to Raise the bar of service excellence, and we do this because we believe...

- That everybody should feel safe no matter the place.
- Great service isn't just doing what's asked, it's delivering what's needed.
- Where there's people, there's potential.
- That trust is precious, and it takes time to earn it.
- In working with pride, passion, and purpose.

## Our values guide how we bring this purpose to life every day, shaping the way we work, interact, and deliver on our beliefs of.....

- People Power - We are only as good as our people and our team is our clear priority.
- Performance – Delivering to exacting needs.
- Leadership – In innovation, accreditation, fair work practices and training.
- Service Excellence – Delivering synchronised service excellence.

Our purpose and values underscore our unwavering commitment to ethical conduct, integrity, and transparency in all our dealings. We are dedicated to implementing effective systems and controls to prevent any form of modern slavery within our business or supply chain. We also expect our suppliers to uphold these same high standards throughout their own supply chains.

A woman with blonde hair, wearing a blue uniform and blue gloves, is holding a white object (possibly a handle or a tool) and looking directly at the camera. The background is blurred, showing what appears to be an industrial or warehouse setting.

# Challenger Services Group Introduction

Challenger Services Group adopts the Australian Modern Slavery Act definition of Modern Slavery. Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another who uses slavery to exploit them for personal or commercial gain.

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to prevent modern slavery within our own business and in our supply chains.

Challenger Services Group also understands that the key to eradicating this complex issue is to set clear expectations for our people and suppliers, which will identify the existence of any potential incidence of modern slavery and enable us to take steps to address it and to prevent such occurrence in the future.

Challenger Services Group aims to lead our industry by example and positively influence the markets in which we operate. As a national business with 1200 + employees and associates, we play an important role in society and have a huge opportunity to drive positive business and social outcomes for our employees, customers and the community.

Challenger Services Group is proud of the steps we have already taken to combat modern slavery, and we recognise that expanding this focus deeper into our supply chain will help to reduce the incidence of modern slavery, not only in Australia but globally.

## 2. Structure, Operations and Supply Chain

Nationally, Challenger is a premier provider of facility management, commercial cleaning, hospitality, and security services solutions.

Our Modern Slavery Strategy is about creating lasting, positive impacts. Instead of focusing solely on short-term financial gains, we seek clients, suppliers and solutions that deliver long-term economic, social, and environmental benefits, ensuring sustainable growth for both Challenger, our clients and the community.

By integrating these principles, we aim to transform the way Challenger operates and interacts with their supply chains and its people. Our approach seeks to foster ethical behaviour, reduce environmental impact, promote human rights, and support societal well-being—all while driving long-term economic success for us and our partners.

We operate across Australia, delivering a wide range of cleaning, security, and staffing solutions to six key market segments:

- Commercial Buildings and Retail Precincts
- Hotels and Hospitality Venues
- Food Manufacturing and Production Facilities
- Government, including Transport Infrastructure
- Aged Care and Education Providers
- Technology Providers

Our diverse customer base includes global brands, national enterprises, and small local suppliers. By fostering strong partnerships, we ensure a unified approach to eradicating modern slavery and promoting compliant, safe, and vibrant workplaces.



# 2.1 Our Reporting Entities

Our business is comprised of several wholly owned subsidiary companies, each delivering services within our core market segments. [This Modern Slavery Statement covers:](#)

**Challenger Services Group Pty Ltd (“CSG”)**

(ABN 60 610 657 479) which is the parent company and reporting entity.

**Challenger Services Pty Ltd, a wholly owned subsidiary of CSG**

(ABN 95 163 895 225) which includes our commercial cleaning and food processing division.

**Challenger Security Pty Ltd, a wholly owned subsidiary of CSG**

(ABN 37 147 923 331) which includes our security services division.

**Challenger Hospitality Pty Ltd, a wholly owned subsidiary of CSG**

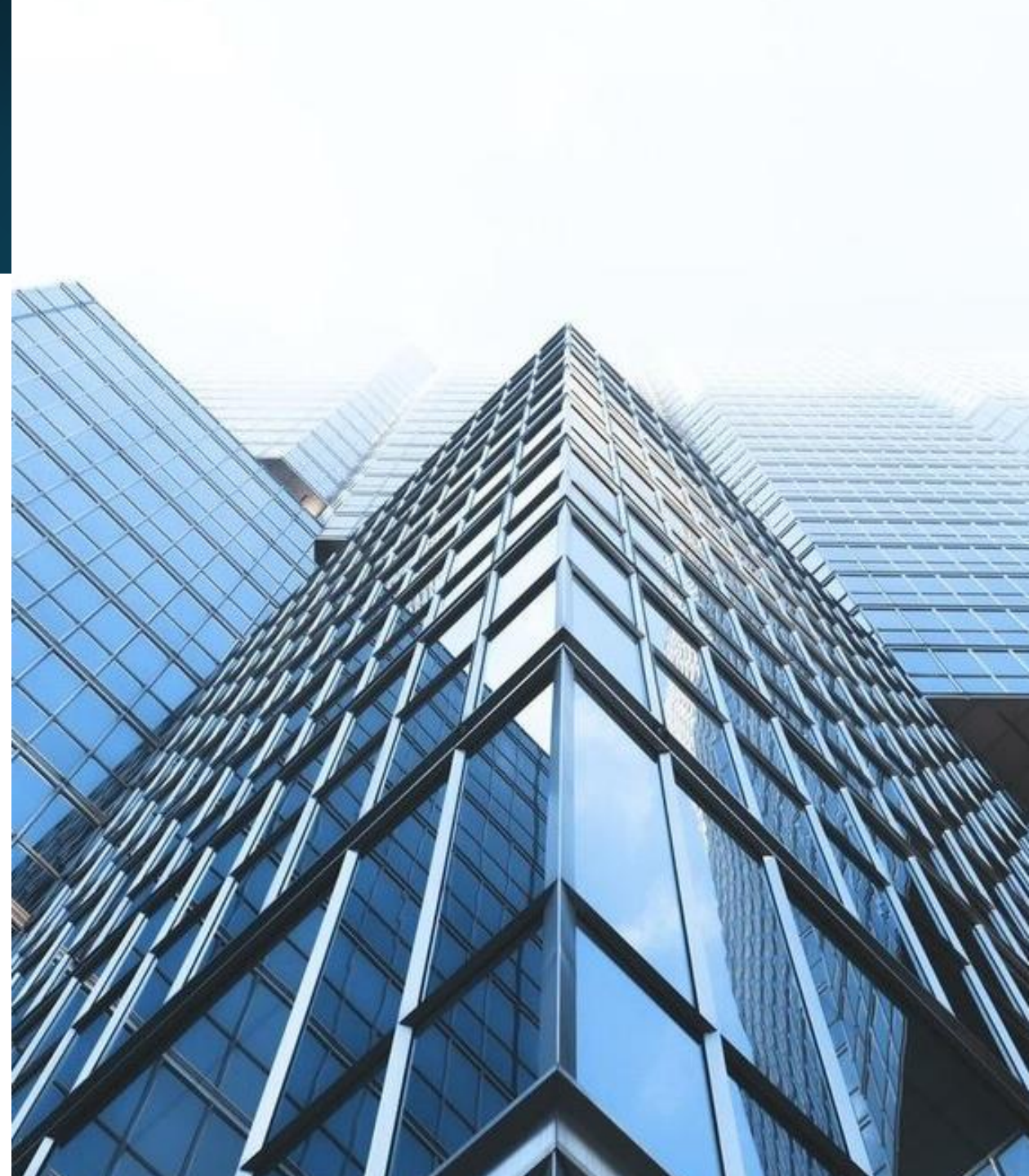
(ABN 56 144 657 107) which includes our hospitality services division.

**Turbo Chute Australia Pty Ltd, a wholly owned subsidiary of CSG**

(ABN 80 636 395 778) which includes our garbage chute cleaning division.

**CHS MNG Pty Ltd, a wholly owned subsidiary of CSG**

(ABN 35 605 506 081) which includes our head office staff division.



# 3. Challenger Services Group Governance



At Challenger Services Group, we are resolutely committed to eradicating modern slavery. This commitment has driven the formation of the CSG Modern Slavery Working Group, led by our Managing Director and comprising the entire CSG Leadership Team, which includes all departmental heads. The Working Group is charged with driving and overseeing our organisation's strategy to combat modern slavery risks. This statement has been unequivocally endorsed by the CSG Leadership Team.

The CSG Leadership Team plays a pivotal role in identifying emerging risks, seizing opportunities, leading stakeholder engagement, and fostering the adoption of best practices throughout the organisation. In parallel, our divisional management teams bear the critical responsibility of identifying, managing, and mitigating any significant modern slavery risks, in strict alignment with the Challenger Services Group Risk Management Framework.

# 3.1 Challenger Services Group Supply Chain



Challenger Services Group recognises that through our supply chain and customers, we can indirectly be exposed to the risk of modern slavery and human trafficking.

We recognise that some of our suppliers may source products and/or materials from countries such as China and Southeast Asia which are higher risk areas.

We also recognise that there may be some slight potential risk in the recruitment of our employees and the recruitment of employees by our Suppliers as well as in the employment conditions of these employees.



## 3.2 Supply Chain Risk Mitigation

Challenger Services Group operates and maintains a preferred supplier listing. Our approach in dealing with our suppliers to mitigate the risk of modern slavery includes the following essential elements:

- We issue our new and existing suppliers with our Modern Slavery Statement and our Modern Slavery Supplier Questionnaire, which requires information and supporting documentation to be provided. The aim of the Questionnaire is to assess our suppliers' policies and practices and to identify, assess and mitigate modern slavery risks in our supply chain.
- We conduct due diligence on all suppliers before allowing them to become preferred suppliers which includes investigations to ensure that they have not been convicted of any offences relating to modern slavery and contraventions of the Fair Work Act 2009 (Cth).
- Challenger Services Group Standard Purchase Order Terms & Conditions and Supply & Service Agreements cover compliance, imposing strict obligations and require warranties from suppliers around compliance with all current legislation and include specific reference to the Modern Slavery Act 2018 and its requirements.
- As part of Challenger Services Group's ongoing supplier management activities, each year we request a subset of our valued suppliers to undertake an audit process covering responsible sourcing principles and payroll compliance.
- Challenger Services Group does not own the factories where products we utilise are manufactured. Instead, we collaborate with third-party distributors to source and purchase products. Our supply chains encompass preferred and vetted providers of goods and services, enabling us to deliver single services, bundled services, and fully integrated facilities management solutions to a wide range of public and private sector clients.
- We are committed to working closely with our suppliers to address and mitigate modern slavery risks within our supply chains. This includes paying particular attention to the heightened risks associated with sourcing specific products from certain regions.
- For all significant suppliers, Challenger Services Group assesses and monitors factors such as ethical sourcing, labour practices, values alignment and existing customer base, as well as commercial matters like price, quality, quantity and lead time.
- Where a supplier is required to comply with the Modern Slavery Act 2018 (Cth), we will ensure that they have a Modern Slavery Statement in place and that their policies and procedures are compliant.
- For suppliers who fall below the requisite reporting threshold, we will wherever possible encourage them to comply with the Modern Slavery Act 2018 (Cth) on a voluntary basis.



**Modern Slavery Act 2018**



# 4. Supplier Adherence to Our Values

To ensure everyone in our supply chain comply with our ethical values we take steps to verify, evaluate and address risks of slavery and human trafficking in our supply chain. Our commitments to human rights and the abolition of Modern Slavery are outlined in the following Company Policies, which are provided to our suppliers and employees:

- **Recruitment Policy** - We operate a robust recruitment policy, including conducting eligibility to work in Australia checks for all employees and ensuring full compliance with the Fair Work Act 2009 (Cth) and the National Employment Standards as a minimum.
- **CSG Code of Conduct** - outlining our commitment to ensuring that our business and operations are conducted legally, ethically and in accordance with the highest standards of integrity and propriety at all times.
- **Anti-Bribery and Corruption Policy** - outlining our zero-tolerance position on bribery and other corrupt behaviour. Its purpose is to ensure that our management team continues to foster a company culture in which bribery and corruption is never acceptable.
- **Discrimination, Harassment and Workplace Bullying Policy** - which recognises that the quality, motivation and performance of our people are the key factors in the achievement of our business objectives. The policy is aimed at achieving a professional environment, with a zero tolerance to discrimination and workplace bullying.
- **Diversity and Equal Employment Opportunity Policy** - which confirms our goal to create a work environment that provides all our employees and associates equal access to information, development and opportunity.
- **Drug and Alcohol Policy** - which confirms our commitment to providing a workplace that is free from hazards associated with illegal &/or recreational drugs and the consumption of alcohol whilst team members are engaged in work activities.
- **Environment Management Policy** - which confirms our commitment to pursuing best practice in protecting the environment.
- **Fatigue Management Policy** - which places a high priority on ensuring that our team members are safe and healthy in the working environment through the implantation of stringent anti fatigue strategies.
- **Freedom of Association Policy** - which confirms our respect for the rights of individuals to associate with industrial groups and associations of their choice.
- **Industrial Relations Policy** – we operate our business in a manner that preserves a harmonious place of work, upholds freedom of association and promotes consultation.
- **Privacy Policy** - which confirms our respect for the privacy of our employees and clients and our commitment to protecting personal information provided to us.
- **Prohibition of Child and Forced Labour Policy** - which confirms our commitment to support international efforts to eliminate child labour.
- **Sustainability and Corporate Responsibility Policy** - which confirms our commitment for implementing and adhering to best practice for ensuring a sustainable environment.
- **Work Health and Safety Policy** - which augments our commitment for ensuring the work health and safety of all persons we employ by implementing stringent policies for maintaining a safe workplace.
- **Whistleblower Policy** - which complies with the provisions set out in section 1317AI of the Corporations Act 2001 (Cth) and affirms our commitment to the protection of whistleblowers and ensuring Challenger Services Group has the requisite training and procedures in place for investigating disclosures.

# 5. Risk of Modern Slavery Practices in Challenger Services Group's Operations & Supply Chain



## 5.1 Identifying Risk

Modern slavery has the potential to exist in cleaning and security operations and relevant supply chains through a variety of circumstances, including forced labour, child labour, debt bondage and human trafficking.

- The cleaning and facilities management industries are considered high risk for instances of modern slavery.
- To mitigate the risk of exploitation among vulnerable groups, our services are primarily self-delivered within Australia. Australia has a low prevalence of modern slavery (as per the Global Slavery Index 2018) and benefits from a strong regulatory framework.
- We enforce company policies through a robust system managed by our Compliance and People & Culture teams, ensuring strict adherence by suppliers and employees.
- We believe there is minimal risk of causing, contributing or being directly linked to instances of modern slavery within our operations.
- To date, we have analysed our supply chain and identified several categories with potential risks of causing, contributing to, or being directly linked to modern slavery.

## 5.2 Cleaning

- Cleaning is often identified as being at a higher risk of modern slavery, including in Australia, due to low-skilled, low-paid, manual work and the high prevalence of short-term, seasonal and migrant workers and subcontractors.
- Respect for human rights is at the core of Challenger Services Group's values. We are deeply committed to our responsibility to eradicate all forms of modern slavery and human trafficking, including exploitation, forced labour, child labour, and servitude.
- Illegal working often leads to exploitative behaviour and can have an adverse impact on the employment of people who are lawfully in Australia. All workers in Australia have the same rights and protections at work, regardless of citizenship or visa status. As a responsible, ethical business, we recognise that our success depends on a protected and nurtured workforce that is valued and respected.
- Challenger Services Group's ethical standards relating to our workforce are enshrined in our Challenger Services Group Code of Conduct and our Company Policies.

# 5. Risk of Modern Slavery Practices in Challenger Services Group's Operations & Supply Chain



## 5.3 Food & Beverage Supplies

- Procurement of high-risk products, particularly from emerging economies, are at an increased risk of modern slavery. We are continually working with suppliers within our procurement control environment, to determine if modern slavery risks have been appropriately addressed.

## 5.4 Uniforms & PPE

- Uniforms, branded clothing and Protective Personal Equipment (PPE) are often sourced from countries with higher risks of modern slavery where government oversight and due diligence processes are less stringent than those in Australia.
- These supply chains are often complex and difficult to monitor beyond the first tier. There is a risk that raw materials such as cotton for shirts, or plastic for buttons may be sourced from businesses where employees have been subjected to modern slavery.

## 5.5 Consultation & Approval Process

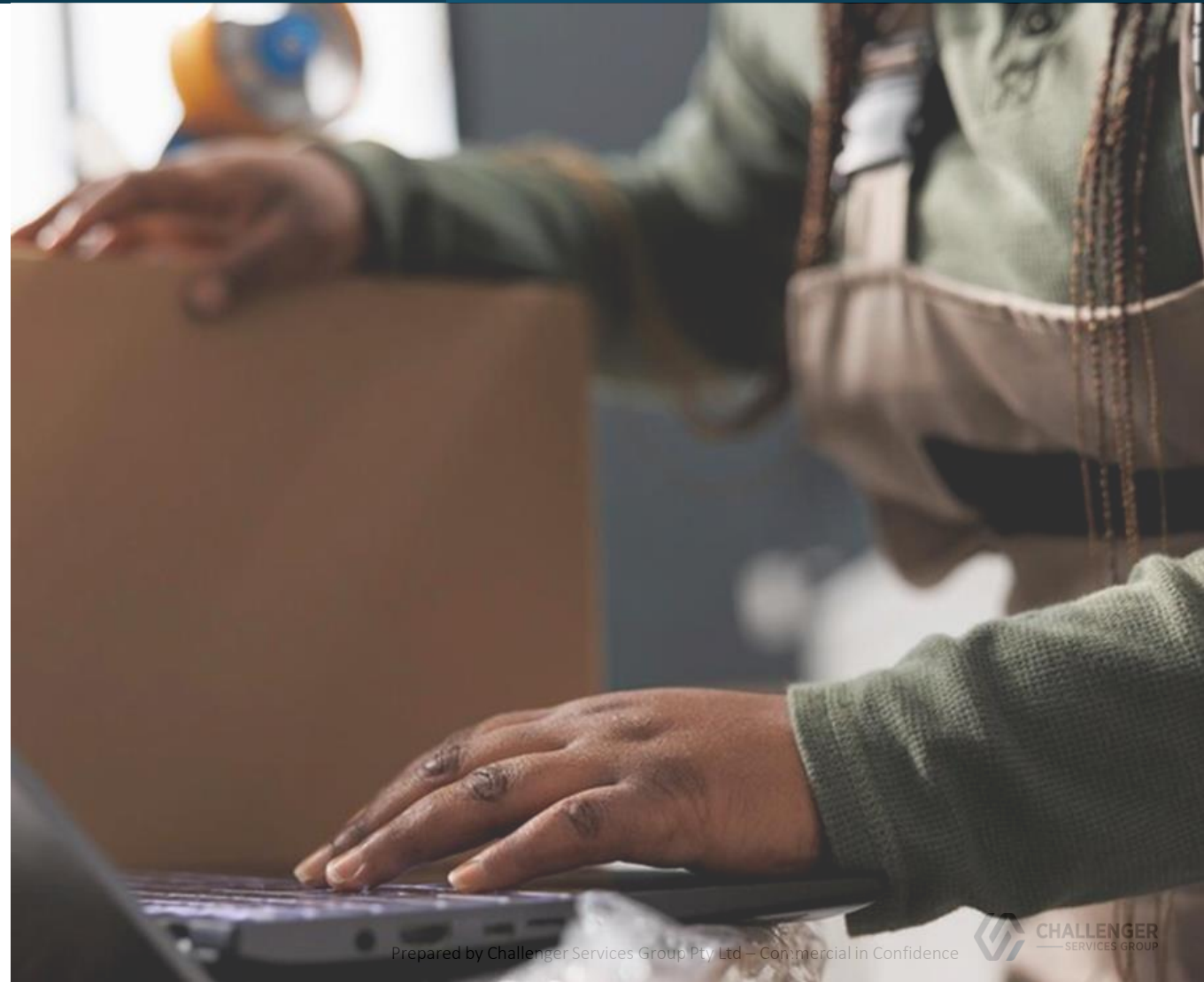
- In performing the actions described throughout this Statement, there is ongoing consultation including engagement with the CSG Modern Slavery Working Group, various levels of management and business unit representatives with oversight of suppliers and subsidiaries assessed as potentially more highly exposed to risks of modern slavery practices.
- The sole director/secretary of Challenger Services Group Pty Ltd, being the reporting entity, is also the sole director/secretary of each of the subsidiary entities listed in section 2.1. As such, all entities speak with one single voice and vision on the issue of modern slavery.
- We will further expand our consultation with customers, partners & suppliers over the coming year.
- The CSG Leadership Team has been involved in the compilation and endorsement of this Statement. The Statement was approved and signed by the Managing Director.



# 5. Risk of Modern Slavery Practices in Challenger Services Group's Operations & Supply Chain

## 5.6 Assessing Effectiveness and Remediation Processes

- All Challenger Services Group Leadership Team members and procurement staff have undertaken modern slavery awareness training and all new supplier agreements include modern slavery clauses and warranties.
- As all new suppliers need to complete a Modern Slavery Questionnaire and be subject to our audit and compliance process, we can gauge the effectiveness of our Modern Slavery mitigation processes.
- Should our ethical sourcing process, review of labour practices, or an anomaly with a supplier's pricing or lead times be indicative of modern slavery practices, Challenger Services Group would immediately issue a supplier with a breach and remedy notice under the terms of our Supply and Service Agreement and require a satisfactory explanation of the suspicious occurrence. Whilst we await the explanation, all services will be suspended pending a resolution. If a satisfactory verifiable explanation is not provided within a provided timeframe, services will be terminated. If the issue is deemed serious and/or be indicative of a modern slavery event, regulatory authorities will be notified, and evidence will be provided.





# 5.7 Future Actions



## 5.7 Future

We recognise that eradicating modern slavery requires dedication to make a positive difference to people's lives, in line with our purpose. Looking ahead, we plan to take the following further steps to build our capabilities in the fight against modern slavery:

- Expanding our use of data and analysis to identify and target high risk suppliers
- Developing and expanding company policies that reflect changing and enhanced prevention measures for the control of modern slavery risks
- Develop and deliver a broader training and awareness program for our staff to increase their understanding and knowledge of modern slavery risks in our operations and supply chain
- Continued maturing of our supply chain risk assurance mechanisms including strengthening of our supplier contractual provisions and audit framework for assessing adherence with modern slavery laws
- Embed opportunities to streamline processes and templates, and enhancement of onboarding and monitoring processes
- Increased collaboration within our networks, customers and supply chain, to strengthen our collective response to modern slavery.
- Engage with more suppliers in the highest risk profile groupings to more deeply assess exposure to modern slavery practices.

# Questions or Concerns

We value all feedback. Please forward any comments on this statement or requests for additional information to:



## This year's Modern Slavery Statement

This statement relates to the activities of Challenger Services Group Pty Ltd and its subsidiaries. It has been prepared by our General Legal Counsel and National Head of People & Culture and was approved on 1 December 2024 by the sole director/secretary of Challenger Services Group Pty Ltd, also being the sole director/secretary of all the subsidiaries of Challenger Services Group Pty Ltd, which are listed in section 2.1.

All references to our, we, us, CSG and Challenger Services Group refer to Challenger Services Group Pty Ltd and its subsidiaries.

A handwritten signature in white ink, appearing to be 'Vadim Gurevich'.

Vadim Gurevich

Managing Director



**CHALLENGER**  
— SERVICES GROUP