

# MODERN SLAVERY STATEMENT

**Australasian  
Landscape Services  
HoldCo Pty Ltd**

**ABN 24 652 220 794**



## Modern Slavery Statement

**Date:** 1/12/2024

Reporting Period 1 July 2023 – 30 June 2024

### Overview

Modern slavery is a serious violation of an individual's dignity and human rights. Exploitative practices, including human trafficking, slavery, servitude, forced labour, debt bondage and forced marriage, are all considered modern slavery and are serious crimes under Australian law. Modern Slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

### Modern Slavery Act 2018

The Australian Government's Modern Slavery Act 2018 ("the Act") came into force on 17<sup>th</sup> of January 2019. The Act establishes a mandatory reporting regime for entities:

- with consolidated revenue of at least A \$100 million in the reporting period, and
- who is either an Australian entity or a foreign entity carrying on business in Australia.

The Act requires reporting of an Annual Modern Slavery Statement. The Statement must identify and address the risks of modern slavery in Green by Nature's operations and supply chains and actions taken to address those risks.

The 7 mandatory criteria require every statement to:

1. Identify the reporting entity
2. Describe the reporting entity's structure, operations and supply chains
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
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
5. Describe how the reporting entity assesses the effectiveness of these actions
6. 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
7. Provide any other relevant information

### Legislative Reporting

Green by Nature is required by legislation to provide an annual Modern Slavery Statement to the relevant Government body and we will align our practices to the requirements of the Commonwealth Act. We will also work closely with suppliers in their reporting requirements.

#### 1. Identifying Australasian Landscape Services HoldCo Pty Ltd (The Reporting Entity)

Australasian Landscape Services HoldCo Pty Ltd ("**ALS**") and its subsidiaries (the "Group") are providers of landscaping and maintenance services for facilities, stadiums, parks, and open spaces across the following sectors being government, private sector, education, aviation, and commercial racecourses throughout Australia and New Zealand.

## **Modern Slavery Statement**

ALS is the owner of the group brand Green by Nature<sup>®</sup>, which is a registered trademark. Throughout this document, the name ALS and Green by Nature, or the Group are used interchangeably to mean Australasian Landscape Services HoldCo Pty Ltd and its subsidiaries.

## **2. Describing ALS's entity's, structure, operations, and supply chains.**

### **2.1 Structure**

The ALS Corporate Structure includes the ultimate parent entity Australasian Landscape Services HoldCo Pty Ltd, which is 100% owner of the entities listed in section 2.2 below, along with the New Zealand entity Recreational Landscape Services Limited and its controlled entities.

#### **The ALS Board**

The ALS Board of Directors (the "Board") consists of 8 Directors.

The Board's role is to oversee the management of the Group and provide strategic guidance. A Board Constitution formally sets out the Board's functions and responsibilities, with the objective of the Board being able to perform its role more effectively. This creates a system of checks and balances to provide a balance of authority.

#### **Green by Nature's Executive Leadership Team**

The Executive Team consists of:

- Chief Executive Officer
- Chief Financial Officer
- Chief Commercial Officer
- Chief People Officer
- Director, Government, Commercial and Infrastructure
- Director, Sports, Community and Education, and
- Director, New Zealand

### **2.2 Operations**

Green by Nature's service model is a dynamic system that meets Green by Nature's clients' ever-changing requirements, by providing specific, innovative, flexible, and cost-effective solutions. This is achieved by having specialised teams located throughout Australia and New Zealand.

#### **Australian Business Number and Address Details**

Australasian Landscaping Services HoldCo Pty Ltd ABN 24 652 220 794

Registered Address: Level 18, 68 Pitt Street, Sydney NSW 2000

Australian Owned/Controlled Entities:

- Australasian Landscape Services Finco Pty Ltd, ABN 23 652 221 157
- Green Options Pty Ltd, ABN 59 002 456 797
- Green Options Commercial Pty Ltd, ABN 14 648 429 172
- Green Options Queensland Landscaping Pty Limited, ABN 23 640 242 440
- Green Options Residential NSW Pty Ltd, ABN 23 665 786 783
- Green Options Maintenance NSW Pty Ltd, ABN 21 640 242 431
- Green Options Landscape NSW Pty Ltd, ABN 13 640 242 459
- Green Options Golf/Renovation NSW Pty Ltd, ABN 15 640 242 468

## **Modern Slavery Statement**

- Green Options Racing Pty Ltd, ABN 32 608 616 548
- Professional Landscape Management Pty Ltd, ABN 86 109 701 297
- Professional Landscape Equipment Pty Ltd, ABN 32 161 103 153
- Skyline Landscape Services Pty Ltd, ABN 82 073 170 279
- Skyline Landscape Services (QLD) Pty Ltd, ABN 15 114 488 041
- Skyline Landscape Services (VIC) Pty Ltd, ABN 62 146 508 858
- Skyline Landscape Services Group Pty Ltd, ABN 36 134 440 476
- Skyline Tree Care Pty Ltd, ABN 99 607 265 305
- Skyline Landscape Management Pty Ltd, ABN 21 137 610 765
- Super Gardens Pty Ltd, ABN 12 007 352 114

## **Countries of Operation**

Australia and New Zealand

## **Stakeholders**

Green by Nature stakeholders include, but are not limited to:

- Our client community
- Federal, Local, State and Territory Governments and their agencies
- Our providers and partners
- Our investors
- Our employees and partners
- Our associates
- The Australian and New Zealand community

## **2.3 Supply Chains**

Green by Nature's partner supply chains include a range of suppliers who provide services or products which are essential for our specialised services to our clients. All of Green by Nature's partner suppliers are required to comply with all laws, statutes, regulations, bylaws, ordinances, or subordinate legislation. All safety, legal and other legislative requirements applicable to the supply chain partners' workplaces are identified by consulting with them. Pertinent information is retained in the supply chain partners' file for future reference.

Green by Nature's major suppliers provide long term and stable supply to enable Green by Nature to achieve its objectives. Green by Nature's major suppliers are based in Australia and New Zealand.

## **3. Describing the risks of modern slavery practices in Green by Nature operations and supply chains**

Our supply chain encompasses a network of suppliers, contractors, and partners who all play pivotal roles in our operations. We actively seek out partners who share our values and who prioritise ethical business practices.

Green by Nature have an established risk management practice which is calibrated to modern slavery provision auditing. We do not believe our currently known supply chain has risks that meet the threshold for serious exploitation as defined by the Modern Slavery Act 2018. Consequently, the risk is assessed as low. Nonetheless, Green by Nature understands that:

## **Modern Slavery Statement**

- There is a possibility that presently assessed contracts and supply chains may develop links to modern slavery further down the supply chain where they are outside of the Group's visibility and control.
- The Group also understands that our visibility of practices in our complete downstream supply chain may be limited in sourcing some goods.
- We also acknowledge that modern slavery risks may alter over time, requiring us to be attuned to broader developments.

### **4. Describing the actions taken by Green by Nature to assess and address these risks, including due diligence and remediation processes.**

This statement applies to all persons working for or on behalf of Green by Nature and related entities, in any capacity, including employees, directors, agency workers, contractors, consultants, suppliers of services or products, and any other third-party representatives.

If at any time Green by Nature becomes aware of practices that would breach The Act in our operations, suppliers, and supply chains used in the performance of contracts, we ensure that our operations, suppliers, and the supply chains must as soon as reasonably practicably take action to address or remove these practices, including where applicable by addressing any practices of other entities in its supply chains.

Green by Nature conducts the following to identify and control risks:

- Scope and determine the Group's supply chains utilising the existing risk assessment methodology
- Formulate policies and procedures concerning modern slavery, including but not limited to collating current policies, identifying gaps, adapting existing policies, and formulating new policies as required
- Systemic risk assessment – highlighting business operations and supply chains where there is a risk of modern slavery taking place
- Assessing and managing identified risks – i.e., carrying out further due diligence in group operations and supply chains and reviewing and adapting contract terms and codes of conduct with suppliers
- Establishing processes to monitor the effectiveness of the steps taken to ensure that modern slavery is not taking place in the business or supply chains
- Implementing remedial steps where modern slavery concerns are identified
- Gaining applicable third-party certifications and audits
- Grievance Reporting

### **Grievance Reporting**

Grievance mechanisms can facilitate early detection of potential adverse impacts. Employees are free and safe to speak up when there are reasonable grounds to suspect that Green by Nature is not acting ethically or in accordance with laws and obligations. Mechanisms have been established for employees to express their concerns or disclosure in relation to modern slavery breaches. This allows for confidential and anonymous reporting and protection from reprisal. Clear processes for investigating and reporting issues raised are also established. Concerns about compliance, ethical issues, illegal activities are to be reported following the processes within the Whistleblower Policy.

## Modern Slavery Statement

### Actions

Through the collective efforts of key staff within the Group, including Directors, Executives, Senior Managers, Finance and Human Resources, the following actions have been determined to minimise our risks:

- Policies and procedures to include our proactive measures implemented to mitigate modern slavery risks
- Continue to adhere to and educate staff making procurement decisions on the Ethical Sourcing Policy
- Review our procedure for engaging subcontractors to ensure they follow best practice with regards to the Modern Slavery Act 2018
- Engage directly with new suppliers to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses
- Develop trusted, transparent relationships with suppliers
- Establish mechanisms for safe reporting of modern slavery risks
- Monitor high risk suppliers

### 5. Describing how Green by Nature assesses the effectiveness of these actions

#### Assessing Effectiveness

We are responsible for the continuous improvement of our processes and actions taken to address modern slavery risks within all tiers of our supply chain, acknowledging this is an ongoing process. The ways in which we measure effectiveness include:

- Regularly reviewing our modern slavery approach and reporting to Senior Management on a periodic basis
- Regularly engaging with tier 1 and high-risk suppliers beyond initial assessment, to identify points of improvement within the process and track awareness levels
- Requesting and monitoring feedback after staff training sessions
- Monitoring frequency and trends of whistleblowing channels

#### Monitoring & Review

Monitoring of suppliers will be conducted through the audit and compliance program. Measuring of results will be through supplier non-conformances and reported grievances. Annual reviews of this statement, associated policies, and risk assessments will be conducted and discussed during Management Review meetings.

### 6. Describing the consultation process Green by Nature utilise with any entities it owns or controls

Green by Nature has undertaken a risk-based approach to consultation with owned or controlled entities to prepare this Statement. Green by Nature launched consultation enabled by our centralised quality system. The Group operates under a consolidated quality assurance and quality improvement framework. As the world's most useful quality management system standard, ISO 9001:2015 is our framework to continually consult, monitor and manage operations across the Group to achieve consistency and meet our obligations. Consequently, extensive consultation and integration leading to this Statement were conducted through an effective and transparent system. This ensures that there is no deviation across the Group in any of its subordinate entities.

## **Modern Slavery Statement**

### **7. Any other relevant information**

Green by Nature remains steadfast in its commitment to eradicating modern slavery, human trafficking, forced labour, and child labour. By championing ethical conduct, transparency, and accountability, we aspire to contribute to a world where exploitation has no place. This statement encapsulates our ongoing endeavours to establish a responsible and sustainable business that upholds the dignity and rights of all individuals.

Green by Nature is dedicated to our Integrated Management System (IMS) and its continual improvement. Green by Nature's IMS is International Organisation for Standardisation (ISO) Certified, which currently includes:

- ISO 9001:2015 - Quality Management Systems
- ISO 14001:2015 - Environmental Management Systems
- ISO 45001:2018 - Occupational Health and Safety Management Systems

Green by Nature is also in the process of attaining B-Corp Certification.

### **8. References**

- Modern Slavery Policy
- Health and Safety Policy
- Whistleblower Policy
- Grievance & Dispute Policy

Approved and Endorsed by the Board

Signed by:



Tomás Chubb  
Chief Executive Officer  
Date: 19 December 2024