

# Modern Slavery Policy

## About Securecorp

Securecorp are a leading national provider of electronics, security, monitoring, cleaning, and integrated services. We have grown since our inception as a Victorian-based security and risk management business in 1998, to a nationwide group of companies delivering the following range of professional services.



Securecorp is highly cognisant of its growth since establishment in 1998 and the risks inherent with increasing globalization and the diversification of supply chains. Accordingly, we are committed to limiting the risk of Modern Slavery occurring within our business, infiltrating our supply chains, and throughout all other business relationships.

This Modern Slavery Policy (**Policy**) applies to all persons working for or on behalf of Securecorp, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative. Securecorp require all colleagues to diligently manage our Modern Slavery risks and to remain vigilant of all Modern Slavery risks within the scope of Securecorp's business and business relationships.

Securecorp require all who have or seek to have, a business relationship with our company, to familiarise themselves with our Modern Slavery Policy (**Policy**) and to act in a way that is consistent with its values. Securecorp will only do business with organisations who fully comply with this Policy, or those who are taking verifiable steps towards its compliance.

This Policy will be used to meet any statement on Modern Slavery and human trafficking obligations that the Securecorp is required to produce in accordance with the *Modern Slavery Act 2018* (Cth) (**the Act**).

## Australia's Modern Slavery Act 2018

*Australia's MS Act 2018* (Cth) defines Modern Slavery as conduct that would constitute;

- (a) an offence under Division 270 or 271 of the *Criminal Code*; or
- (b) an offence under either of those Divisions if the conduct took place in Australia; or
- (c) trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or
- (d) the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

All forms of Modern Slavery involve the deprivation of a person’s liberty by another in order to exploit them for commercial or personal gain; and; amount to a violation of an individual’s fundamental human rights. Tackling Modern Slavery requires everyone to play a part and to remain vigilant to the risk in all aspects of the Securecorp’s business and business relationships.

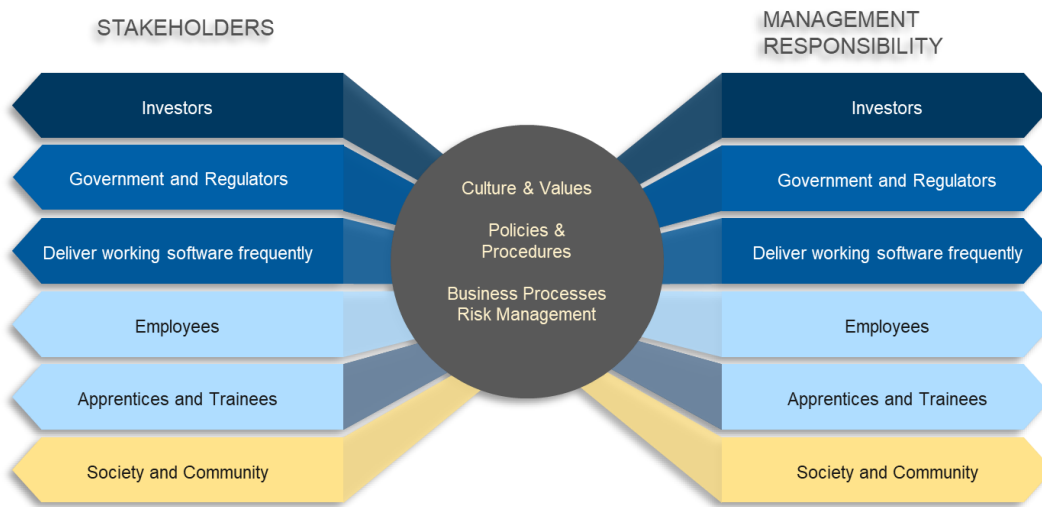
### Scope

This Policy applies across the Securecorp group of companies (Group), to provide a united approach to the Group’s commitment to addressing Modern Slavery risks. Where relevant, a reference to Securecorp includes reference to the Group.

Securecorp innovatively engages a collaborative approach to managing Modern Slavery. Our organisation ensures that all areas within the entities we own, or control are cognisant of the actions vital to effectively managing the Modern Slavery risks relative to their areas of operations. Securecorp engages in a consultative process that considers each entities relationship with the other and the risk profiles relative to that relationship.

Securecorp warrants that this process adequately ensures that the Modern Slavery risks relative to each entity we own, or control has been appropriately identified, assessed, and addressed, and that each entity is aware of the appropriate arrangements necessary to manage those risks. In summary, Securecorp’s Organisation and Governance Structure can be represented by the diagram in Figure 1.

**Figure 1 – Securecorp’s Organisation and Governance Structure**

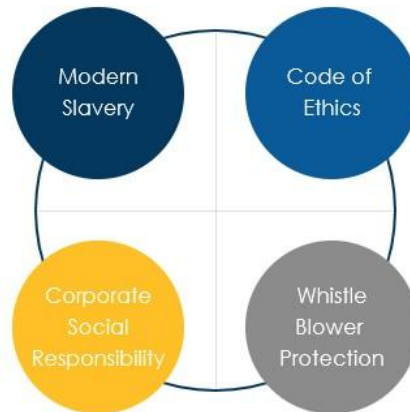


Securecorp’s top management engages with and is accountable to stakeholders on a day-to-day basis, including investors, Government bodies, regulators, employees, apprentices, trainees and more generally the wider community. Encompassing Securecorp’s corporate governance structure are its policies and procedures, values, principles, and a highly intuitive risk intelligence culture.

Securecorp’s operations are administered by an experienced leadership team with Securecorp’s Managing Director overseeing the day-to-day operations of the company. Securecorp follows a documented process that delegates the authority required to ensure leadership responsibilities are effectively maintained across all areas of the business.

## Policies and Procedures

Securecorp is highly cognisant of the importance in protecting human rights and we are committed to protecting the rights of all people. Modern Slavery goes against the fundamental principles, and values that Securecorp upholds. Accordingly, Securecorp maintains the key policies and procedures that document the processes essential to our organisation assisting in the protection of human rights.



## Risk of Modern Slavery in Operations and Supply Chains

Securecorp acknowledges that Modern Slavery risks can occur in our operations and supply chains. As a proud Australian business, Securecorp is committed to engaging Australian suppliers wherever possible for its Australian operations. Securecorp recognises the services that contribute to its own services extend beyond those received from direct suppliers. Securecorp's supply chain also includes services used by indirect suppliers.

Risks of modern slavery practices means the potential for causing, contributing, or being directly linked to Modern Slavery through operations and supply chains.



Modern Slavery has the potential to exist in Securecorp's supply chains in a number of ways, including by child labour, debt bondage, forced labour and human trafficking.

Securecorp appreciate the following risks in our operations and supply chains may:

1. Cause Modern Slavery practices;
2. Contribute to Modern Slavery practices; and
3. Be directly linked to Modern Slavery practices.

Securecorp considers the third risk is most likely (if any), in that we may be directly linked to Modern Slavery practices. Securecorp is highly aware of the risk that its operations and services may be connected to Modern Slavery through the activities of another entity Securecorp has a business relationship with, including those suppliers which maintain most operations outside Australia.

Accordingly, Securecorp is committed to continually improving how it works with business, government, suppliers, and society to meet moral and ethical obligations to combat Modern Slavery and human trafficking. Securecorp is strongly committed to working with its suppliers to eliminate Modern Slavery from its supply chain.

## Due Diligence and Risk Management

Securecorp is committed to working with its stakeholders to identify and understand the impacts of its activities. Due diligence is implemented to prevent and mitigate adverse impacts arising from Securecorp's activities. Our due diligence refers to the organisation's ongoing management process to identify, prevent, mitigate, and account for how Securecorp addresses actual and potential adverse human rights impacts in its operations and supply chains.

### Governance



Securecorp consider that good governance is essential to the long-term sustainable success in eliminating Modern Slavery. Good corporate governance is paramount to the cultural values throughout our operations and is the collective responsibility of all levels of management and all employees. The risk of Modern Slavery in Securecorp's operations and supply chain is assessed within our corporate-wide governance and risk management framework. Responsibility for assessing and addressing Modern Slavery risks has been assigned to Top Management who are charged with briefing Securecorp's leadership team regularly and informatively.

### Contractual Arrangements



Securecorp ensures that suppliers and contractors comply with Securecorp policies through contractual arrangements, audits, and procurement principles. Securecorp's contractual terms and conditions require minimum standards in corporate social responsibility, ethical business practices, safety, and environmental protection to be met.

### Grievance and Feedback



Securecorp promote numerous mechanisms for stakeholders, employees, and other third parties to anonymously report suspected or actual illegal activities, breaches of human rights, and/or company policies. Training in appropriate reporting channels features in our core inductions modules that each employee and contractor must undertake before commencing engagement.

Securecorp clients, suppliers, and third parties can raise Modern Slavery-related concerns via our webpage <https://www.Securecorp.com.au> Grievances can also be received via direct correspondence, company social media or through bodies such as the Human Rights Commission, relevant tribunals, and the Department of Home Affairs.

Where concerns are raised, Securecorp will investigate in accordance with regulatory requirements and applicable policies and procedures. In instances where Modern Slavery is evident, our organisation will direct all contact to the Australian Federal Police (AFP) on 131AFP (131237) or use the [online form to report information regarding human trafficking](#). Securecorp's grievance procedures ensure all grievances are managed and investigated in a comprehensive, timely and transparent manner.

### Statutory Declarations



Before engagement, Securecorp invite all suppliers to collaboratively work with us to help prevent Modern Slavery occurring throughout our suppliers' operations and supply chains. We require all suppliers to sign a statutory declaration or equivalent requesting their commitment to identify risks and to protect their organisation and supply chain from Modern Slavery practices. Securecorp's intention to collaboratively combat Modern Slavery with our suppliers is explicitly addressed in supplier contracts, prequalification's, and all relevant documentation.

Our organisation is thoroughly prepared to respond to all suspected occurrences of Modern Slavery ensuing in its operations and/or supply chains.

### Communication and Training



Securecorp engage a risk based collaborative approach to evaluating suppliers, contractors, and all entities within the Group. Our communication and consultation processes are scheduled from operational level through to Top Management. Top Management are committed to ensuring that all colleagues receive sufficient training and support relevant to the applicable scope of their responsibilities.

### Our Commitment

Securecorp are committed to;

- Maintaining scheduled executive reviews of its response to Modern Slavery.
- Undertaking ongoing scheduled audits of all contractors.
- Carrying out timely investigation of all reported or suspected breaches.
- Conducting scheduled wage, and superannuation audits.
- Undertaking scheduled assessments of risk-based supplier surveys.
- Maintaining ongoing review of reporting channels and grievance mechanisms.
- Conducting internal audits of our risk management processes.
- Providing informative and relevant training to all employees.

### Responsibility for this Policy

Our Executive Team has overall responsibility for this Policy and in ensuring that Securecorp complies with all its legal and ethical obligations. All Executives are responsible for ensuring that their teams comply with the provisions of this policy in the day-to-day performance of their roles.

### Witnessing /Reporting breaches of this policy

Should you become aware of or witness any suspected breached of this Policy or any illegal or unethical behaviour you are required to be proactive and promptly report these matters to your line manager, next level manager or the Company's Compliance team. Complaints will be kept confidential and will be dealt with appropriately. You will not experience retribution or retaliation for a complaint made in "good faith". If a member of staff believes that a breach of this Policy has occurred or is likely to occur, they must report this as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions constitutes any of the various forms of Modern Slavery, you should raise this with your manager /next level manager or the Company's Compliance Team.

Securecorp aims to encourage openness and will support any person who raises genuine concerns in good faith under this Policy, even if the information turns out to be incorrect, or mistaken.

Securecorp also maintains a Whistleblower Protection Policy that promotes and supports a culture of compliance, honesty, and ethical behaviour. Please refer to the Securecorp Whistleblower Protection Policy for further details and reporting processes.

### **Policy Breaches**

A breach of this policy by any Securecorp team member may lead to disciplinary action being taken in accordance with the Company's Code of Ethics. Serious breaches may be regarded as gross misconduct and can lead to immediate dismissal. All workers will be expected to co-operate as far as reasonably practicable in any investigation into suspected breaches of this Policy; or any related processes or procedures. It is important to remember that Modern Slavery is a criminal offence in Australia and offenders can be prosecuted.

### **Status of This Policy**

This Modern Slavery Policy will be reviewed by Executive Management on a regular basis.

Approved by: Managing Director